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								August 2025, then delivery shall be 68 units in the first 5 year period; 241 in yrs 6-10; and, 644 units in the last seven years of the plan period. This provides just 14 units per annum in the first five years, rising to 48 units in yrs 6-10 and then 92 units in yrs 11-17. Historic Affordable Housing delivery (2011–24) was just 195 dwellings (15 p.a.), well below need.				504 Frontloaded delivery not secured Current projection shows the delivery of 309 units (68 + 241 = 309) in the first 10 years against a requirement of 860 (86 x 10 = 860). This means the authority is planning for a shortfall of 551 units in the first 10 years of the plan.							
0319-0004	Agent	Jam es	Chapman	Discovery Land and Planning		SP2	No	4. Missed Opportunities Problem: The Council has not audited its own residential land holdings for redevelopment or densification opportunities, particularly low-density estates. It has also not considered managed redevelopment of private gardens despite evidence of significant capacity (800 - 1,600 dwellings depending on assumptions – see Appendix). Why Unsound: Plan has not demonstrated that all reasonable alternatives have been tested, contrary to the NPPF requirement for justification.	No	Not Stated		Suggested Modifications: - Undertake and publish a full audit of Council-owned residential land. - Introduce policies supporting sensitive densification and estate renewal. - Carry out a Garden Land Capacity Study and adopt criteria-based policies to manage appropriate redevelopment. Requested Modifications (a) Restate the supply tables, removing post-period units. (b) Replace the stepped trajectory with an annual, site-by-site profile including non-implementation discounts. (c) Remove holiday replacement units from the deliverable tally unless robust evidence is provided. (d) Publish a clear Affordable Housing delivery plan with monitoring triggers. (e) Audit Council-owned residential estates			Yes	A	The Council has not audited its own residential land holdings for redevelopment or densification opportunities, particularly low-density estates. It has also not considered managed redevelopment of private gardens despite evidence of significant capacity (800 - 1,600 dwellings depending on assumptions – see Appendix). Why Unsound: Plan has not demonstrated that all reasonable alternatives have been tested,	Where appropriate, this would have fallen into the 'Additional land identified by the Council ' category referred to in the Housing Topic Paper.	N

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												for early densification and include them in the trajectory. (f) Commission and publish a Garden Land Capacity Study to inform policy.					contrary to the NPPF requirement for justification.		
0352-0001	Agent	Mike	Tanous	Dove Jeffrey Homes		SP3	No	I thought I would write to you to explain the following information regarding Castle point Council and their latest local plan will identify to you that Castle point council are an example of why the government will never achieve the deputy Prime Minister Angela Rayner's target at 1.5 million homes Castle Point Borough Council's continuing failure to plan for housing I am writing to seek your views on, and the Government's intended response to, the latest Regulation 19 draft Local Plan published by Castle Point Borough Council (CPBC). I strongly believe in the Labour government's housing plan, and our view is that CPBC is directly undermining the Labour government's desire to get Britain building again. A decades-long absence of a sound plan Castle Point has not had an adopted, up-to-date Local Plan since 1998. In December 2023, the then Secretary of State, Rt Hon Michael Gove MP, issued a formal direction, warning that the Department would	No		Questions for the Government 1. Will the Department use its intervention powers, for example by commissioning a directly-prepared plan or removing plan-making powers if an authority's Regulation 19 draft is demonstrably non-compliant? 2. What further sanctions or incentives (financial, Housing Delivery Test penalties, or planning freedoms) does the Government envisage to realign local political incentives with national objectives? We would be grateful for your response to these questions and for an outline of the steps you intend to take to ensure that councils such as Castle Point cannot continue to thwart the Government's housing-delivery ambitions. It frustrates me that we finally have a government that recognises the strategic significance of housing, and then a local council like Castle Point seems to be actively undermining it. The key objective to build houses					Suggests that CPBC is directly undermining the Labour government's desire to get Britain building again. Requests government intervention	Noted	N	

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								intervene unless CPBC set and met a credible timetable for submission and adoption. The Regulation 19 draft ignores the NPPF housing requirement The standard-method figure published by DLUHC in May 2025 indicates that Castle Point must plan for 686 dwellings per annum (Approx. 11,660 homes over the 17-year plan period 2026-43). By contrast, the draft plan provides for only 6,196 homes, representing barely 53% of the minimum need. In other words, the Council openly accepts that its plan is not “positively prepared” nor “consistent with national policy”, contrary to paragraph 36 of the NPPF. Castle Point has spent £1.6m of taxpayers' money on developing an inadequate housing plan once again. If you build on this land, the ground floor is only usable for storage or a car. To build this floor cost approximately £60,000 of government and taxpayers wasted money. Castle point council are abusing the existing government and have been doing so since 1998. Where is a company Dove property group and Dove Jeffery homes we were proposing and working with counsellor calling for			for the youth and other people of the country by having rental mortgage to pay gets people to work not sitting around I'm not sure about this not working not drinking taking drugs or committing crimes. We need you to finally push the country forward and back to where we should be in the world. If you wish to meet us and discuss all the all the issues and topics regarding Castle point and the application and the future of the of the Castle point region we will be happy to meet with with us and members of the consortium if you need any further details, let us know or if you want to attend the sites and look at the local area which I think it would be incredibly important then that we're very happy to step up or either organise an online call or a physical meeting .									

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								local sites since 2005 over a period of 20 years. We have spent a considerable amount of money in time Trying to bring forward a credible scheme to build affordable housing for local residents and young people with a total of 36 acres currently under our control but also we have formed the north west thundersley consortium over 100 acres of Greybelt Land which potentially could deliver up to 4000 homes in NW Thundersley for Castle Port Council and the local residents with other developers. Which this would link to major roads relieve the traffic and also various hospital schools and infrastructure you know we have done the studies in the master plan on this. The land is actually a grey belt site which were outlined to the council in a meeting and explained all our latest plans in early 2025 and they were very keen on the concept and proposal. It is the opinion of many in the borough that the council doing this to please a few local and influential people with vested interest and a lot not looking to the future of the borough particularly the young people the homeless and key lead 3 to 4 bedroom home starter											

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								homes in the region of £400,000 to 500,000 which doesn't give a young people a chance to get on the housing ladder and this is what we want to do. It's our aim as a company as an ethical builder and company having built thousands of houses in this particular Essex Suffolk Norfolk region we have the necessary experience and track record to deliver that a product for young people that is affordable and is within the government guidelines and objectives. The general consensus is that the government needs to put their foot down and put pressure on these councils to deliver and show who is in control about the future development of our country and its planning requirement. Misaligned incentives Councillors have made no secret of the fact that releasing Green Belt land is electorally toxic. Their incentive is therefore to publish an undeliverable plan, secure in the knowledge that: ● Speculative development will be blamed on Planning Inspectors, not local politicians. ● Castle Point is likely to be merged into a new “South Essex” unitary authority under current											

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								reorganisation proposals; members prefer to leave politically difficult decisions to the successor council. The result is a plan that frustrates both Government housing objectives and the wishes of the electorate that voted overwhelmingly for change at the last general election.											
0922-0001	Organisation	Michael	Bevington	Electrosensitivity UK	Yes	INFRA6	Yes		No	Effective	§§ 19.71 and 19.73 recognise that the ICNIRP Guidelines exclude protection for people with implants. (a) However, the Castle Point Plan Draft document does not recognise that the ICNIRP Guidelines also exclude protection for long-term and non-thermal effects of radiofrequency radiation and EMFs. Long-term and non-thermal effects have been established since 1953 and include neurological and cardiovascular harm, infertility and cancers. Therefore both EMFs and RF-EMF have been classified as 2B	19.75 It is recognised that the ICNIRP Guidelines are not protective for people with implants and against long-term and non-thermal effects. Therefore where possible wireless infrastructure should be sited over 500m from residences, schools and hospitals.	No	Not Answered	Not Answered	A	§§ 19.71 and 19.73 recognise that the ICNIRP Guidelines exclude protection for people with implants. (a) However, the Castle Point Plan Draft document does not recognise that the ICNIRP Guidelines also exclude protection for long-term and non-thermal effects of radiofrequency radiation and EMFs. Long-term and non-thermal effects have been established since	Noted	N

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											carcinogens since 2001 and 2011 respectively and three recent studies have found that RF-EMFs should be considered a class 1 known cancer, including studies by the FDA/NTP and the WHO. Since EMFs and RF-EMF are carcinogenic through long-term and non-thermal exposures, the Draft document should recognise that all emissions of RF-EMFs are extremely hazardous to all residents and people near them. A common set-back adopted elsewhere is 500m from housing, residences, schools and hospitals. (b) One established result of exposure to man-made EMFs and RF-EMFs is the condition Electromagnetic Hypersensitivity. This has been recognised since 2021 by 32 worldwide experts in their Scientific Consensus International Report. This represents the mainstream viewpoint as opposed to the ICNIRP minority viewpoint which denies the need to protect against long-term and non-thermal effects. ICNIRP's minority viewpoint is based on Schwan's invalidated hypothesis of 1953 that the only effect of RF-EMF is heating, but this has been disproved in numerous scientific studies. (c) To protect people with						1953 and include neurological and cardiovascular harm, infertility and cancers. Therefore both EMFs and RF-EMF have been classified as 2B carcinogens since 2001 and 2011 respectively and three recent studies have found that RF-EMFs should be considered a class 1 known cancer, including studies by the FDA/NTP and the WHO. Since EMFs and RF-EMF are carcinogenic through long-term and non-thermal exposures, the Draft document should recognise that all emissions of RF-EMFs are extremely hazardous to all residents and people near them. A common set-back adopted elsewhere is 500m from housing, residences, schools and hospitals. (b) One established result of exposure to man-made EMFs and RF-EMFs is the		

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											the condition Electromagnetic Hypersensitivity a set-back of at least 500m from masts is required. Estimates of the percentage of the population with the condition Electromagnetic Hypersensitivity typically range from 1.6 to 3.5%. Mainstream science, such as the International Commission on the Biological Effects of Electromagnetic Fields, regards the ICNIRP Guidelines as unproductive of the general population. Appropriate protective guidelines are e.g. EUROPAEM 2016 and IGNIR.						condition Electromagnetic Hypersensitivity. This has been recognised since 2021 by 32 worldwide experts in their Scientific Consensus International Report. This represents the mainstream viewpoint as opposed to the ICNIRP minority viewpoint which denies the need to protect against long-term and non-thermal effects. ICNIRP's minority viewpoint is based on Schwan's invalidated hypothesis of 1953 that the only effect of RF-EMF is heating, but this has been disproved in numerous scientific studies. (c) To protect people with the condition Electromagnetic Hypersensitivity a set-back of at least 500m from masts is required. Estimates of the percentage of the population with the condition		

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																	Electromagnetic Hypersensitivity typically range from 1.6 to 3.5%. Mainstream science, such as the International Commission on the Biological Effects of Electromagnetic Fields, regards the ICNIRP Guidelines as unproductive of the general population. Appropriate protective guidelines are e.g. EUROPAEM 2016 and IGNIR. Suggested Mod: 19.75 It is recognised that the ICNIRP Guidelines are not protective for people with implants and against long-term and non-thermal effects. Therefore where possible wireless infrastructure should be sited over 500m from residences, schools and hospitals.		
0922-0002	Organisation	Michael	Bevington	Electrosensitivity UK	Yes	SD6	Yes		No	Effective	Some people, including those with specific health conditions, are adversely affected by LED streetlights which have too much blue light. Street	§21.56. Add: Best practice should be followed in providing LED lighting suitable for people sensitive to LEDs.	No	Not Answered		A	Some people, including those with specific health conditions, are adversely affected by LED	Noted	N

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											lighting should follow best practice for these health conditions. See information from LightAware on Streetlights and legal cases in the UK requiring local authorities to substitute safe lighting for harmful LEDs.						streetlights which have too much blue light. Street lighting should follow best practice for these health conditions. See information from LightAware on Streetlights and legal cases in the UK requiring local authorities to substitute safe lighting for harmful LEDs.		
0768-0001	Organisation	Eileen	OConnor	EM Radiation Research Trust	Yes	INFRA6	No	The consultation process risks breaching the Gunning Principles by failing to provide sufficient information on the health, fire, and safety risks of telecommunications infrastructure. In addition, reliance on ICNIRP self-certification, including certificates submitted under dissolved or invalid company names, may be unlawful. The plan also risks breaching the Council's Public Sector Equality Duty (Equality Act 2010, Section 149) by failing to consider the needs of vulnerable groups such as people with medical implants and those with electromagnetic hypersensitivity (EHS).	No		See attachment for further justification. Policy Infra6 is not sound because it: Relies solely on ICNIRP guidance, which only considers thermal effects and ignores substantial evidence of non-thermal biological effects. Assumes mast sharing automatically reduces impacts, when in fact it can intensify local exposures and fire risks. Fails to apply the precautionary principle, despite WHO/IARC 2025 findings confirming carcinogenicity in animals. Fails to protect vulnerable groups (children, elderly, AIMD users, electrosensitive individuals), contrary to	Modifications necessary to make the plan legally compliant and/or sound: Abandon sole reliance on ICNIRP self-certification; require independent expert certification for all telecoms infrastructure. Apply minimum setbacks: 500 m from homes, 1,000 m from schools and sensitive sites. Explicitly protect vulnerable groups (children, elderly, AIMD users, cancer survivors, electrosensitive individuals). Require full planning scrutiny for all base stations, including those under 15 m. Prioritise fibre-to-the-premises (FTTP) broadband over wireless deployment.	No	Not Answered	Yes	A	Objects to INFRA6 because: Failure to provide sufficient information health, fire and safety risks of telecommunications infrastructure Reliance on ICNIRP self certification may be unlawful - doesnt take into account non-thermal biological effects Failing to consider the needs of vulnerable groups	Health, Fire and Safety Risks These are covered under building regulations to ensure any development of this nature is safe. ICNIRP Referring to the International Commission on Non-Ionising Radiation is best practice and ensures the applications submitted are regulated under this body. Failing to consider the needs of vulnerable	2b. an assessment of whether there would be any impacts of the proposal to individuals or groups protected under the equalities act, by carrying out an Equality Impact Assessment and

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											national equality and planning policy. Ignores legal precedents (Thomas v. Cheltenham, Skelt v. Secretary of State) confirming that ICNIRP compliance cannot negate legitimate health objections.	Apply Stewart Report recommendations, especially preventing the “beam of greatest intensity” from falling on schools. Conduct mandatory fire and structural risk assessments for all masts and small cells. Require disclosure and regulation of operating power levels, modulation types, pulsing, and the cumulative effect of multiple frequency bands, with independent monitoring and enforcement. Adopt biologically based exposure guidelines recommended by independent scientists (e.g., BioInitiative and Building Biology guidelines), which apply precautionary safety limits far below ICNIRP thresholds.						groups The entirety of the plan has been assessed to consider the needs of vulnerable groups, please see the Equality Impact Assessment. Further to this policy INFRA 6 requires a risk assessment to be submitted. To ensure compliance with the Public Sector Equality Duty (PSED), a modification has been added for an equality impact assessment to be undertaken so that the impact on any affected groups has been conciously considered.	identifying any appropriate mitigation measures; and
0823-0001	Organisation	Pat	Abbott	Environment Agency	Yes	SP1	Yes		Yes		Policy 1.1 - We support policy SP1.1 – in particular, providing protection and enhancement to the areas of particular importance to biodiversity, Policy 1.2 - We support SP1.2, In addition, the biodiversity benefits and natural flood management	Policy 1.1 - We support policy SP1.1 – in particular, providing protection and enhancement to the areas of particular importance to biodiversity, Policy 1.2 - We support SP1.2, In addition, the biodiversity benefits and natural flood management	No	Not Answered	Not Answered	A	Support policy SP1	Support noted.	N

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											opportunities could be incorporated into the reasoned justification. The council should resist proposals that lead to a decrease in the provision and quality of, and fails to enhance, the status of green and blue infrastructure, in accordance with the Water Framework Directive. Paragraph 6.11 - We strongly support the reasoned justification for Policy SP1, included in paragraph 6.11, which mentions the 15% uplift on standard biodiversity units and recognises the importance of the blue/green infrastructure network.	opportunities could be incorporated into the reasoned justification. The council should resist proposals that lead to a decrease in the provision and quality of, and fails to enhance, the status of green and blue infrastructure, in accordance with the Water Framework Directive. Paragraph 6.11 - We strongly support the reasoned justification for Policy SP1, included in paragraph 6.11, which mentions the 15% uplift on standard biodiversity units and recognises the importance of the blue/green infrastructure network.							
0823-0002	Organisation	Pat	Abbott	Environment Agency	Yes	SP3	Yes		Yes		The proposed 173 homes at Thorney Bay and the additional 3,143 across Canvey Urban Sites Allocations and Broad Location (Policies C1, C4, C9 and C10)" – poses further challenges to the performance on the existing non-tidal drainage infrastructure currently serving the Island. The bulk of the surface water infrastructure is Anglian Water's but they connect to the Environment Agency's pumping stations via designated main river watercourses. This should be noted in	The proposed 173 homes at Thorney Bay and the additional 3,143 across Canvey Urban Sites Allocations and Broad Location (Policies C1, C4, C9 and C10)" – poses further challenges to the performance on the existing non-tidal drainage infrastructure currently serving the Island. The bulk of the surface water infrastructure is Anglian Water's but they connect to the Environment Agency's pumping stations via designated main river watercourses. This should be noted in reasoned justification for the policy	No	Not Answered		A	Encourages liaison with the environment agency at the earliest opportunity	Comments noted. Please see modifications to policy C8	N

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											reasoned justification for the policy and developers should be encouraged to discuss this issues and potential challenges it poses with the Environment Agency at the earliest opportunity.	and developers should be encouraged to discuss this issues and potential challenges it poses with the Environment Agency at the earliest opportunity.							
0823-0003	Organisation	Pat	Abbott	Environment Agency	Yes	SP4	Yes		Yes		We are pleased to see that flood and water management is included in the list of infrastructure where developer contributions may be required. We welcome the proposal that s106 agreements and CIL charges could be used to fund flood infrastructure.We also welcome the statement that '[planning] permission [will] only granted if [there is a] demonstration of sufficient infrastructure capacity, including wastewater utility.' It is important that wastewater provision is available to support growth and prevent environmental harm to the water environment.	We are pleased to see that flood and water management is included in the list of infrastructure where developer contributions may be required. We welcome the proposal that s106 agreements and CIL charges could be used to fund flood infrastructure. We also welcome the statement that '[planning] permission [will] only granted if [there is a] demonstration of sufficient infrastructure capacity, including wastewater utility.' It is important that wastewater provision is available to support growth and prevent environmental harm to the water environment.	No	Not Answered		A	Supports policy SP4	Support noted	N
0823-0004	Organisation	Pat	Abbott	Environment Agency	Yes	Canvey Island	Yes		Yes		Paragraph 8.26 – We welcome the Council's commitment to develop a Riverside Strategy with the Environment Agency and other partners and to confirm that the Masterplan for the Seafront Entertainment Area will need to reflect this Strategy.Paragraph 8.30 - We welcome the	Paragraph 8.26 – We welcome the Council's commitment to develop a Riverside Strategy with the Environment Agency and other partners and to confirm that the Masterplan for the Seafront Entertainment Area will need to reflect this Strategy. Paragraph 8.30 - We welcome the Council's	No	Not Answered		A	Supports the text in paragraphs 8.26 and 8.30	Support noted.	N

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											Council's reference, in the context of Port-related development, to the safeguarded area for protecting future flooddefence infrastructure improvement and maintenance interests.	reference, in the context of Port-related development, to the safeguarded area for protecting future flood defence infrastructure improvement and maintenance interests.							
0823-0005	Organisation	Pat	Abbott	Environment Agency	Yes	C2	Yes		Yes		Paragraph 8.25 - Refers to the work being undertaken to the flood defences to enhance this area and offer ongoing flood protection. We support the inclusion of this section, however this work is now complete and therefore the text is out of date.We feel it could be replaced with the following "The seafront sits behind the Canvey Island sea defences which have recently benefitted from the Environment Agency's multi-million pound investment of central government funding to maintain the defences' high level of tidal flood risk management work and deal with the impact of rising sea levels"	Paragraph 8.25 - Refers to the work being undertaken to the flood defences to enhance this area and offer ongoing flood protection. We support the inclusion of this section, however this work is now complete and therefore the text is out of date.We feel it could be replaced with the following "The seafront sits behind the Canvey Island sea defences which have recently benefitted from the Environment Agency's multi-million pound investment of central government funding to maintain the defences' high level of tidal flood risk management work and deal with the impact of rising sea levels"	No	Not Answered		A	Supports the policy but makes suggestion to correct that the works to the sea defences have now been completed "Theseafront sits behind the Canvey Island sea defences which have recently benefitted from the Environment Agency's multi-million pound investment of central government funding to maintain the defences' high level of tidal flood risk management work and deal with the impact of rising sea levels"	See modifications proposed	8.25 The seafront sits behind the Canvey Island sea defence s which ~~are~~ are undergoing enhance d work to increase their protecti on and deal with the impact of rising sea levels.h ave recently benefitted from the Environ ment Agency' s multi-million

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																			pound investment of central government funding to maintain the defences' high level of tidal flood risk management work and deal with the impact of rising sea levels.
0823-0006	Organisation	Pat	Abbott	Environment Agency	Yes	C4	Yes		Yes		We feel that some text should be incorporated into point 3 or point 6, to recognise the need for the Council and developers to provide adequate space for future maintenance activities relating to the two main river watercourses (Charfleets Dyke and Sluice Farm Dyke) within the Master planning requirements for this land allocation. Master Planning and re-development may provide opportunities to improve flood risk associated with	We feel that some text should be incorporated into point 3 or point 6, to recognise the need for the Council and developers to provide adequate space for future maintenance activities relating to the two main river watercourses (Charfleets Dyke and Sluice Farm Dyke) within the Master planning requirements for this land allocation. Master Planning and re-development may provide opportunities to improve flood risk associated with	No	Not Answered		A	Wants to take the opportunity to ensure adequate space is provided for future maintenance of the two main watercourses (Charfleets Dyke and Sluice Farm Dyke). Recommends aspirations for improved flood risk associated with the convegance of Charfleets Dyke	Comments noted, see modifications proposed.	3. Improved public realm which prioritises pedestrian movements and creates spaces for community, civic and

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											the conveyance of Charfleets Dyke (especially within the Charfleets Industrial Estate) which has historically suffered from landowner culverting. Paragraph 172c of the NPPF advocates the taking of opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding. The policy and supporting text could recognise and aspire to the inclusion of this as an opportunity, perhaps within the body of Points 3 or Point 6 of Policy C4 – West Canvey. The council need to consider the challenges of overlapping timeframes will present between TE2100 aspirations for defence raising against proposed housing delivery. We would promote early engagement between the council, developers and Environment Agency as the plans for West Canvey are developed so that the potential issues related to the overlapping timescales can be addressed at the earliest stage. This should be reflected in the reasoned justification/supporting text.	the conveyance of Charfleets Dyke (especially within the Charfleets Industrial Estate) which has historically suffered from landowner culverting. Paragraph 172c of the NPPF advocates the taking of opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding. The policy and supporting text could recognise and aspire to the inclusion of this as an opportunity, perhaps within the body of Points 3 or Point 6 of Policy C4 – West Canvey. The council need to consider the challenges of overlapping timeframes will present between TE2100 aspirations for defence raising against proposed housing delivery. We would promote early engagement between the council, developers and Environment Agency as the plans for West Canvey are developed so that the potential issues related to the overlapping timescales can be addressed at the earliest stage. This should be reflected in the reasoned justification/supporting text.					(that has historically suffered from land owner culverting). Consider the challenges of timeframes with the TE2100 and encourages early engagement with the EA - this should be included within the reasoned justification.		business activities. The public realm strategy should integrate urban greening and incorporate sustainable drainage into the approach to materials and landscaping. The inclusion of flood resilient design and opportunities to reduce the causes and impacts of flooding should also be considered

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																			where possible." 8.39 added to end of paragraph. Early engagement with the environment agency is also recommended to consider the challenges of overlapping timeframes will present between TE2100 aspirations for defence raising against proposed housing delivery.

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0823-0007	Organisation	Pat	Abbott	Environment Agency	Yes	C5	Yes		Yes		We support the Council's undertaking to carry out a feasibility study to look at options for improving access to, from and within Canvey Island. This would provide useful additional infrastructure to help facilitate evacuation in the event of forecast tidal flooding as well as providing improvements in day-to-day peak hour traffic congestion. We would strongly recommend that the Essex Resilience Forum are included in the scoping and undertaking of the feasibility study (in their multi-Agency Emergency Planning role) along with Essex County Council in their Highways and Transportation Authority role and perhaps this should be reflected in the text of paragraph 8.50.	We support the Council's undertaking to carry out a feasibility study to look at options for improving access to, from and within Canvey Island. This would provide useful additional infrastructure to help facilitate evacuation in the event of forecast tidal flooding as well as providing improvements in day-to-day peak hour traffic congestion. We would strongly recommend that the Essex Resilience Forum are included in the scoping and undertaking of the feasibility study (in their multi-Agency Emergency Planning role) along with Essex County Council in their Highways and Transportation Authority role and perhaps this should be reflected in the text of paragraph 8.50.	No	Not Answered		A	Support for policy C5 and suggestion for the inclusion of the reference to the Essex Resilience Forum in the supporting text at paragraph 8.50	Support noted, see proposed modifications	8.50 ECC as Highway and Transportation Authority will be required to be directly involved in the scoping and undertaking of any feasibility study. The Essex Resilience Forum (in their multi-Agency Emergency Planning role) should also be included in the scoping and undertaking of the feasibility study.

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0823-0008	Organisation	Pat	Abbott	Environment Agency	Yes	C8	Yes		No	Consistent with national policy	We find part of Policy C8 (4.b.) unsound. The policy promotes a principle of increased residential development on these sites, but does not clearly state that increases in residential development on these sites cannot be in the form of Park Homes. These sites, Kings Park and Sandy Bay, lie within Flood Zone 3. Park homes intended for permanent residential use are classified by Annex 3: Flood risk vulnerability classification of the NPPF as “highly vulnerable”. Table 2 (para 079) of the Flood risk and coastal change PPG states that “Highly vulnerable” classes of development are incompatible with Flood Zones 3a and 3b and that those forms of development “should not be permitted”. The reasoning as to why permanently occupied caravan, mobile home and park home sites were considered to have a high vulnerability to flooding was first given in Para 70 of PPG25 (2001) which stated:- “Caravan, camping and other temporary occupancy sites give rise to special problems in relation to flooding. They have often been located on coastal or		No	Not Answered		A	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).	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	“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 can be found in Improving the Flood Performance of New Buildings and Building a Flood Resilient

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											riverside sites with a high risk of flooding. The instability of caravans places their occupants at special risk and it may be difficult to operate an effective flood warning system. Such development should be refused in the areas at highest risk, where overtopping or breach of defences would lead to rapid inundation, as should proposed changes of use to residential mobile homes or permanent housing”. This principle was maintained and clarified when PPS25 replaced PPG25 in 2006 with the introduction of the Flood Zones and the Flood Risk Vulnerability Classification and the compatibility table of Flood Risk Vulnerability relative to Flood Zone (Annex D: Tables D1, D2 & D3 of PPS25). Paragraphs D19 to D21 of PPS25 Annex D gave the reasoning for classing permanent occupied/residential and temporary occupied/holiday caravan sites differently stating:- “D19. Land used for holiday or short-let caravans and camping, other temporary occupancy sites and permanently occupied caravan, mobile home and ‘park home’ sites that use similar structures give rise to special problems in								these sites is limited. The Council is keen to encourage that any dwellings on these sites are flood-resilient and has proposed changes to the policy to 4.a. and 4.b.	t 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;

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											relation to flooding. Caravan or park-home sites intended for permanent occupation are regarded as ‘highly vulnerable’. The instability of such structures places their occupants at special risk and they are likely to be occupied during periods when flood risk is likely to be higher. D20. Sites intended for temporary occupation are classified as ‘more vulnerable’ because they are usually occupied at times of the year when flood events are less likely to occur, although they may be located for amenity and recreational reasons on coastal or riverside sites with a high residual risk of flooding. However, the attractiveness of waterside sites for holiday accommodation also has to be recognised, provided that proper warning and evacuation arrangements are put in place through appropriate planning conditions. D21. In either case, the Sequential Test and Exception Test should be used by decision-makers (where applicable, – remembering that ‘highly vulnerable’ development should not be permitted in Zones 3a and 3b and ‘more vulnerable’ development								

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											should not be permitted in Zone 3b). FRAs should pay particular attention to the management of residual risk, flood warning arrangements and evacuation plans should be considered (see Annex G)". The NPPF and the Flood risk and coastal change NPPG maintain this position of “highly vulnerable” development classes being incompatible with Flood Zones 3a and 3b as can be seen in Table 2 of the PPG which is a retained version of Table D3 from PPS25. The NPPF is clear in paragraph 170 that Inappropriate development should be avoided in areas of highest risk. Table 2 of the PPG (which helps the LPA to apply the Sequential Test) states clearly that “highly vulnerable” classes of development should not be permitted in Flood Zones 3a or 3b. Both Sandy Bay and Kings Park lie within Flood Zone 3a. The Local Plan policy should better clarify the types of redevelopment that would be acceptable on this site, particularly if there is to be an increase in the overall quantum of residential development, for example a minimum of 2-storey flood resilient dwelling houses or blocks of flats (with no self-								

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											contained ground floor residential uses for flats) to replace conventional Park Homes. This would help to improve the flood resilience of housing on the site and provide better provisions for residents to be safe should flooding affect the sites. Currently part 4.c. of Policy C8 can be interpreted as any redevelopment will be acceptable if development (either Park Homes or conventional dwelling houses) retains or increases the number of residences. We feel that this part of the policy could be re-written to better reflect the spirit of the supporting text in the Reasoned Justification (para 8.69) and to offset any interpretation that the council is compliant to proposals that would seek to site a greater number of Park Homes on these sites and reflect the policies set out in the NPPF and PPG.								
0823-0009	Organisation	Pat	Abbott	Environment Agency	Yes	B7	Yes		No	Justified	We note that site B7A (Richmond Avenue Car Park) is located in an area, shown by the current Flood Map for Planning, as falling within Flood Zone's 2 and 3. The Level 2 SFRA site summary (used as evidence base for Sequential Approach considerations) shows the site as		No	Not Answered		A	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-	It is agreed that policy B7A and B8 has been updated to reflect the New National Flood Risk Assessment and be re-evaluated. The SFRA has been updated to take account of the New National	N

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											predominantly within Flood Zone 1 – see below The Level 2 SFRA dated July 2025 has used outputs from the Flood Map for Planning prior to its update on 25th March 2025 which utilised the new National Flood Risk Assessment (NaFRA) data. We were not consulted by the LPA during the preparation of the Level 2 SFRA Site Assessments, and would have advised the LPA over the change in understanding over the extent of Flood Zones affecting this site. We would recommend that the Council reviews this site allocation by providing an updated SFRA Level 2 site evaluation to provide site-specific recommendations on the siting of residential and commercial development. This should take a Sequential Approach to the location of “more vulnerable” development to areas of the site that are at the lowest risk of flooding and making suitable text amendments to the site policy that would direct any housing development to be sited outside of the areas understood to be within Flood Zones 2 and 3 within the boundaries of the site. It should also be ensured that the site passes the flood risk sequential test						Richmond Avenue car park and Site B8 Manor Trading Estate) had re-changed as a result of the NaFRA2 modelling.	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.	

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											taking into account the current flood risk affecting the site.								
0823-0010	Organisation	Pat	Abbott	Environment Agency	Yes	B8	Yes		No	Justified	We note that parts of site B8 (Manor Trading Estate) are located in an area, shown by the current Flood Map for Planning, as falling within Flood Zone's 2 and 3 (below left). Prior to the 25th March 2025, the Flood Map for Planning showed the site lying wholly within Flood Zone 1 (see below right) FMfP (post-25th March 2025) FMfP (pre-25th March 2025) Unfortunately, the Level 1 SFRA has relied on the understanding of Flood Zones from the pre-March 2025 Flood Map for Planning which showed that the entirety of this site was previously understood to lie entirely in Flood Zone 1 and the LPA has not re-evaluated its SFRA or site evaluations since the updated Flood Map for Planning (March 2025). We would recommend that		No	Not Answered		A	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.	It is agreed that policy B7A and B8 has been updated to reflect the New National Flood Risk Assessment and be re-evaluated. 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.	N

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											the Council reviews this site allocation by providing an updated SFRA Level 2 site evaluation to provide site-specific recommendations on the siting of residential and commercial development. This should take a Sequential Approach to the location of “more vulnerable” development to areas of the site that are at the lowest risk of flooding and making suitable text amendments to the site policy that would direct any housing development to be sited outside of the areas understood to be within Flood Zones 2 and 3 within the boundaries of the site.								
0823-0011	Organisation	Pat	Abbott	Environment Agency	Yes	HO U5	Yes		Yes		Caravans, mobile homes and park homes intended for permanent residential use are considered by Annex 3 of the NPPF to be “highly vulnerable” whereas sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plans are considered to be “more vulnerable”. Table 2 of the PPG for Flood risk and coastal change states that “Highly vulnerable” classes should not be permitted in Flood Zone 3a or 3b and that more vulnerable may be permitted if the Exception Test is passed and that	Caravans, mobile homes and park homes intended for permanent residential use are considered by Annex 3 of the NPPF to be “highly vulnerable” whereas sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plans are considered to be “more vulnerable”. Table 2 of the PPG for Flood risk and coastal change states that “Highly vulnerable” classes should not be permitted in Flood Zone 3a or 3b and that more vulnerable may be permitted if the Exception Test is passed and that there are adequate specific warning and evacuation plans in	No	Not Answered		A	Concern for caravans, mobile homes and park homes intended for permanent residential use within flood zone 3a. Policy Hou5 proposes that “consideration will be given as to whether a condition should be used to restrict the winter use of caravans.” Perhaps this should be reworded to read “consideration will be given as to	Policy wording change noted - see proposed modifications	2. Where applications for new park homes are made, consideration will be given as to whether a condition should be used to restrict the winter

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											there are adequate specific warning and evacuation plans in place. Policy Hou5 proposes that “consideration will be given as to whether a condition should be used to restrict the winter use of caravans.” Perhaps this should be reworded to read “consideration will be given as to whether a condition should be used to restrict the winter use of new Park Homes” The policy should be clear that new caravans or park homes intended for permanent residential use in FZ3 are contrary to the NPPF & PPG. We believe that the key issue here is the “residential” element as opposed to “holiday” use, and that this is partly why Park Homes are considered to be “Highly Vulnerable” and inappropriate to Flood Zone 3. This is partly because of their susceptibility to significant flood damage, rendering their occupants homeless (if the Park Home is their sole residence), as opposed to occupants not being rendered homeless if their seasonal caravan/Park Home is damaged by flooding. We believe that Policy Hou5 would be more compatible with the NPPF and PPG if	place. Policy Hou5 proposes that “consideration will be given as to whether a condition should be used to restrict the winter use of caravans.” Perhaps this should be reworded to read “consideration will be given as to whether a condition should be used to restrict the winter use of new Park Homes” The policy should be clear that new caravans or park homes intended for permanent residential use in FZ3 are contrary to the NPPF & PPG. We believe that the key issue here is the “residential” element as opposed to “holiday” use, and that this is partly why Park Homes are considered to be “Highly Vulnerable” and inappropriate to Flood Zone 3. This is partly because of their susceptibility to significant flood damage, rendering their occupants homeless (if the Park Home is their sole residence), as opposed to occupants not being rendered homeless if their seasonal caravan/Park Home is damaged by flooding. We believe that Policy Hou5 would be more compatible with the NPPF and PPG if (1) cannot be the sole					whether a condition should be used to restrict the winter use of new Park Homes” The policy should be clear that new caravans or park homes intended for permanent residential use in FZ3 are contrary to the NPPF & PPG. We believe that Policy Hou5 would be more compatible with the NPPF and PPG if the policy would contain wording to make clear that new Park Homes (1) cannot be the sole residence of the occupier/owner, (2) will be for holiday/leisure use through the authorised season, and; (3) occupancy will be seasonally restricted to times outside of the winter months. This would align the policy aims more towards the development appropriateness guidance in Table 2		use of caravans Parkhomes. Winter use will be restricted where: 13.45 To this end, the Council will seek to limit the further provision of park homes to the existing caravan sites, and where possible and necessary will restrict new park homes providing residential accommodation to ensure

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											the policy would contain wording to make clear that new Park Homes (1) cannot be the sole residence of the occupier/owner, (2) will be for holiday/leisure use through the authorised season, and; (3) occupancy will be seasonally restricted to times outside of the winter months. This would align the policy aims more towards the development appropriateness guidance in Table 2 of the Flood risk and coastal change PPG and the definitions of vulnerability classifications provided in Annex 3 of the NPPF which differentiate vulnerability for the use of these type of structures relative to “residential” or “holiday/short-let caravan usage.	residence of the occupier/owner, (2) will be for holiday/leisure use through the authorised season, and; (3) occupancy will be seasonally restricted to times outside of the winter months. This would align the policy aims more towards the development appropriateness guidance in Table 2 of the Flood risk and coastal change PPG and the definitions of vulnerability classifications provided in Annex 3 of the NPPF which differentiate vulnerability for the use of these type of structures relative to “residential” or “holiday/short-let caravan usage.					of the Flood risk and coastal change PPG and the definitions of vulnerability classifications provided in Annex 3 of the NPPF which differentiate vulnerability for the use of these type of structures relative to “residential” or “holiday/short-let caravan usage.		these are not the sole residence where the occupants are likely to be at risk from flooding or the effects of cold weather. It should be noted that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitted under the existing consents for the use of the site as a

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																			caravan park.
0823-0012	Organisation	Pat	Abbott	Environment Agency	Yes	D6	Yes		Yes		Where there are proposals for residential annexes to single storey properties within flood risk areas, there are opportunities to provide areas of refuge above flood levels where none currently exist with the host building. Without opportunities to better manage the residual risks of flooding, there is a likelihood that the consequences of a flood to people and property will be worse Flood risk is a function of likelihood/chance and impact/consequence, and without useful mitigations. It is likely that flood risk will increase on sites through exposing more	Where there are proposals for residential annexes to single storey properties within flood risk areas, there are opportunities to provide areas of refuge above flood levels where none currently exist with the host building. Without opportunities to better manage the residual risks of flooding, there is a likelihood that the consequences of a flood to people and property will be worse Flood risk is a function of likelihood/chance and impact/consequence, and without useful mitigations. It is likely that flood risk will increase on sites through exposing more people to the	Not Answered	Not Answered		A	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	Comments noted. 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. Please see modifications proposed.	1d. Flood Risk: The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to

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											people to the hazards of flooding if extension or annex developments are granted without addressing the increase in impact that a flood of a given likelihood could produce within the site. We would welcome an addition to the policy wording to identify that annexes and extensions to single storey properties located within areas of high flood risk (from rivers, the sea or from surface water) must provide a place of safety/refuge area for occupants that is above the assessed level of flooding from any source. For annex or extensions in areas at risk of flooding, flood resistance and resilience measures should be required as part of the design as specified in paragraph 181(b) of the NPPF so that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment.	hazards of flooding if extension or annex developments are granted without addressing the increase in impact that a flood of a given likelihood could produce within the site. We would welcome an addition to the policy wording to identify that annexes and extensions to single storey properties located within areas of high flood risk (from rivers, the sea or from surface water) must provide a place of safety/refuge area for occupants that is above the assessed level of flooding from any source. For annex or extensions in areas at risk of flooding, flood resistance and resilience measures should be required as part of the design as specified in paragraph 181(b) of the NPPF so that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment.					the extension. The 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.			be quickly brought back to use without significant refurbishment following a flood event. For single storey dwelling , a place of safety/r efuge above the asse sse d level of flooding from any source should be provide d whereve r possibl e.
0823-0013	Organisat ion	Pat	Abb ott	Envir onment Agen cy	Yes	ENV 3	Yes		Ye s		Paragraph 18.29 - We feel this is a strong policy overall and particularly welcome the inclusion of the requirement for the delivery of 20% BNG on		No	Not Ans wer ed		A	Strong support for this policy, the EA feels the reasoned justification could be strengthened by referring to Water	Noted, see modifications	18.29 The Environ ment Act 2021	

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											greenfield sites. We feel the policy and reasoned justification could be strengthened further through the inclusion of reference to measures that would contribute to Water Framework Directive objectives for developments adjacent to watercourses. This could include promoting opportunities for riverbank naturalisation, the removal of in-channel structures, de-culverting of piped watercourses, and riparian zone enhancements. Plans for development adjacent to or encompassing a watercourse should include a minimum 10 m buffer zone along both sides of the watercourse to create a corridor of land and water favourable to the enhancement of biodiversity.						Framework Directive objectives for developments adjacent to watercourses. This could include promoting opportunities for riverbank naturalisation, the removal of in-channel structures, de-culverting of piped watercourses, and riparian zone enhancements. Plans for development adjacent to or encompassing a watercourse should include a minimum 10 m buffer zone along both sides of the watercourse to create a corridor of land and water favourable to the enhancement of biodiversity.		introduced Biodiversity Net Gain. This mandates that most developments should deliver at least 10% biodiversity net gain, using a specific metric developed by the Government. Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability

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																			testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex. For developments

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																			adjacent to watercourses the Water Framework Objectives should be utilised.
0823-0014	Organisation	Pat	Abbott	Environment Agency	Yes	INFRA1	Yes		Yes		The Local Plan and Policy Infra1 on Community Provision does not appear to include the provision of cemetery and burial space. We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore applicants should be advised to contact us to ensure that they are using the current version.	The Local Plan and Policy Infra1 on Community Provision does not appear to include the provision of cemetery and burial space. We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore applicants should be advised to contact us to ensure that they are using the current version.	No	Not Answered		A	Concerned that the policy does not reference the provision of cemetery and burial space. We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore applicants should be advised to contact us to ensure that they are using the current version.	Comments noted, see modifications proposed.	19.13 For the purpose 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

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																			health facilities , facilities for emergency services , including police facilities , education facilities , libraries, community halls, criminal justice facilities meeting rooms, places of worship, cemeteries and burial grounds , public toilets, pubs and post offices. New paragraph after 19.15 For

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																			development proposals relating to cemeteries and burial grounds , there should be regard to the guidance for Cemeteries and burials; Protecting ground water from human burials and The Environment Agency's Approach to Ground water Protection."

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0823-0015	Organisation	Pat	Abbott	Environment Agency	Yes	SD1	Yes		Yes		Please note that there is an error within the published consultation document, in part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood” Whilst we are supportive of this section, we would suggest that the wording of part 1.b. is slightly amended to read “New bungalows and other forms of self-contained residential accommodation at ground level, including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably designed place of refuge above the predicted flood levels can be provided within the development.....” We strongly support the Council’s inclusion of a 19m land safeguarding buffer on the landward side of the existing tidal flood defences which respects the policy guidance given in paragraph 172(b) of the NPPF which states that all plans should safeguard land from development that is required, or likely to be required, for current or future flood management and reflects the guidance given by Recommendation 5-6 of the Castle Point Level	Please note that there is an error within the published consultation document, in part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood” Whilst we are supportive of this section, we would suggest that the wording of part 1.b. is slightly amended to read “New bungalows and other forms of self-contained residential accommodation at ground level, including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably designed place of refuge above the predicted flood levels can be provided within the development.....” We strongly support the Council’s inclusion of a 19m land safeguarding buffer on the landward side of the existing tidal flood defences which respects the policy guidance given in paragraph 172(b) of the NPPF which states that all plans should safeguard land from development that is required, or likely to be required, for current or future flood management and reflects the guidance given by Recommendation 5-6 of the Castle Point Level	No	Not Answered		A	Supports policy SD1 but suggests some amendments including: part 1.b. of Policy SD1 which incorrectly states “floor” and which should read “flood” part 1.b. is slightly amended to read “New bungalows and other forms of self-contained residential accommodation at ground level, including extensions and annexes, will be refused on Canvey Island unless an internally accessible and suitably designed place of refuge above the predicted flood levels can be provided within the development.....” Paragraph 21.15 - We welcome the inclusion in the reasoned justification, that developers should discuss developments with	Support noted, see proposed modifications	1b. New bungalows and other forms of self-contained residential accommodation at ground level including extensions and annexes , will be refused on Canvey Island unless an internally accessible and suitably sized and designed place of refuge above the predicted flood floor levels

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											1 SFRA. This will help to achieve Outcome 12 of the TE2100 Plan https://www.gov.uk/guidance/what-needs-to-be-done-across-the-estuary-outcomes-thames-estuary-2100#outcome-twelve to deliver the TE2100 Policy 4 (P4) – take further action to keep up with climate and land use change so that flood risk does not increase which has been set for Canvey Island https://www.gov.uk/guidance/managing-future-flood-risk-and-thames-barrier-thames-estuary-2100#flood-policies and https://www.gov.uk/guidance/canvey-island-policy-unit-thames-estuary-2100 Paragraph 21.15 - We welcome the inclusion in the reasoned justification, that developers should discuss developments with the Environment Agency at the earliest opportunity when their proposals are sited close to flood defences. We would also welcome discussions regarding the Riverside Strategy where appropriate and this could be added to the current text. Paragraph 21.13 – this wording should be amended to read “The Council will work with the Environment Agency to	achieve Outcome 12 of the TE2100 Plan https://www.gov.uk/guidance/what-needs-to-be-done-across-the-estuary-outcomes-thames-estuary-2100#outcome-twelve to deliver the TE2100 Policy 4 (P4) – take further action to keep up with climate and land use change so that flood risk does not increase which has been set for Canvey Island https://www.gov.uk/guidance/managing-future-flood-risk-and-thames-barrier-thames-estuary-2100#flood-policies and https://www.gov.uk/guidance/canvey-island-policy-unit-thames-estuary-2100 Paragraph 21.15 - We welcome the inclusion in the reasoned justification, that developers should discuss developments with the Environment Agency at the earliest opportunity when their proposals are sited close to flood defences. We would also welcome discussions regarding the Riverside Strategy where appropriate and this could be added to the current text. Paragraph 21.13 – this wording should be amended to read “The Council will work with the Environment Agency to ensure that these ongoing improvements are					the Environment Agency at the earliest opportunity when their proposals are sited close to flood defences. We would also welcome discussions regarding the Riverside Strategy where appropriate and this could be added to the current text. Paragraph 21.13 – this wording should be amended to read “The Council will work with the Environment Agency to ensure that these ongoing improvements are planned, receive full funding from relevant sources and delivered.” Which would reflect the wording contained in Strategic Policy SP4 Development Contributions Paragraph 21.14 – Whilst we agree with the wording of the this paragraph in the reasoned justification we would suggest a		can be provided within the development, and favourable consideration will be given to the conversion of bungalows to houses, subject to those privacy, amenity and urban design considerations set out in the Castle Point Design Code; 21.13 The TE2100 Plan, prepared by the Environment Agency

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											ensure that these ongoing improvements are planned, receive full funding from relevant sources and delivered.” Which would reflect the wording contained in Strategic Policy SP4 Development Contributions Paragraph 21.14 – Whilst we agree with the wording of the this paragraph in the reasoned justification we would suggest a change to the last sentence from ‘The Environment Agency has advised that a 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose’ to read “The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose”.	planned, receive full funding from relevant sources and delivered.” Which would reflect the wording contained in Strategic Policy SP4 Development Contributions Paragraph 21.14 – Whilst we agree with the wording of the this paragraph in the reasoned justification we would suggest a change to the last sentence from ‘The Environment Agency has advised that a 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose’ to read “The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose”.					change to the last sentence from ‘The Environment Agency has advised that a 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose’ to read “The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea defence structure, should be left free from development for this purpose”.		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

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																			will work with the Environment Agency to ensure that these ongoing improvements are planned , receive full funding from relevant sources and are delivered. Any works to retain or enhance sea walls, or within the 19m safeguarded buffer zone, should avoid causing adverse effects on site integrity. This will need to be

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																			demonstrated through a project level HRA. 21.15 Developers are encouraged to enter into discussions with the Environment Agency at a very early stage when formulating development proposals close to or within the safeguarded sea defence area and where appropriate The Riverside Strategy

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																			. Flood Risk Activity Permits were introduced under the Environmental Permitting (England and Wales) (Amendment) (No.2) Regulations in April 2016. Early discussions with the Environment Agency will avoid the potential for costly development design and layout revisions or to avoid

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																			the risk of having a flood risk permit application refused by the Environment Agency. Flood Risk Activity Permits are separate to the planning application process and are required by the Environment Agency for certain activities within set distances from tidal defences – further guidance is set out by

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																			the Environment Agency. 21.14 The current preferred tidal flood risk management policy for the tidal defence s within the TE2100 Plan's Canvey Island policy unit is to take further action to keep up with climate and land use change so that flood risk does not increase . In order to help deliver the

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																			TE2100 Plan's aspirations for the Canvey Island policy unit, it is necessary for land adjacent to tidal defences to be left free from development as far as possible . This is to provide thespace for the permanent footprint required of larger defences. Accessibility is also essential in delivering such improvements

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																			(both for facilitating the construction of new defences as well as for vehicular access (4x4 or construction plant) to maintain and inspect and repair the defences over their lifetime) . The Environment Agency has advised that a minimum 19m buffer, as measured from the landward edge of the current sea

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																			defence structure, should be left free from development for this purpose .
0823-0016	Organisation	Pat	Abbott	Environment Agency	Yes	SD2	Yes		Yes		While we support the inclusion of this Policy, we feel that it could be enhanced by the addition of a point specifying that:- Only essential infrastructure or water compatible types of development will be considered in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b) The Reasoned Justification could refer to Recommendation 5-7 of the Level 1 SFRA which	While we support the inclusion of this Policy, we feel that it could be enhanced by the addition of a point specifying that:- Only essential infrastructure or water compatible types of development will be considered in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b) The Reasoned Justification could refer to Recommendation 5-7 of the Level 1 SFRA which includes	No	Not Answered		A	Support policy SD2 but suggest the following: Only essential infrastructure or water compatible types of development will be considered in areas identified by the Castle Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b) The Reasoned	Support noted, see proposed modifications	2. Only essential infrastructure or water compatible types of development will be supported in areas identified by the Castle

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											includes text on how applications for redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered.	text on how applications for redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered.					Justification could refer to Recommendation 5-7 of the Level 1 SFRA which includes text on how applications for redevelopment of previously developed sites located within mapped areas of Functional Floodplain would be considered.		Point Level 1 SFRA as Functional Floodplain (Flood Zone 3b), subject to compliance with all other relevant policies of this Plan. 21.28 Recommendation of the Level 1 SFRA which includes text on how applications for redevelopment of previously developed sites located within mapped areas of

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																			Functional Floodplain would be considered. In terms of fluvial flooding, the SFRA 2024 identifies the Prittle Brook and Benfleet Hall Sewer, as being sources of fluvial flood risk. Fluvial flooding is also possible from the watercourses and dykes that form the drainage system on Canvey Island, due to

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																			the flat and low-lying topography of the island and the finite capacity of the culverted sections of the drainage infrastructure. Some of this network drains to tide via flapped outfalls which only operate at low-tide. If water were to overtop these dykes, the flat topography of the Borough could cause it to disperse

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																			over large areas.
0823-0017	Organisation	Pat	Abbott	Environment Agency	Yes	SD3	Yes		Yes		We welcome the inclusion of policy SD3 regarding SuDS. We feel the policy distinguishes the increased risk between shallow and deep infiltration systems. For the benefit of applicants, we recommend that the following guidance is also referenced within this policy: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; National standards for sustainable drainage systems on gov.uk.	We welcome the inclusion of policy SD3 regarding SuDS. We feel the policy distinguishes the increased risk between shallow and deep infiltration systems. For the benefit of applicants, we recommend that the following guidance is also referenced within this policy: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; National standards for sustainable drainage systems on gov.uk.	No	Not Answered		A	Supports policy SD3 Recommends this guidance be referred to The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; National standards for sustainable drainage systems on gov.uk.	Support noted, see proposed modifications	21.34 Essex County Council has prepared a SuDS Design Guide for Essex. This not only addresses technical requirements for SuDS, but also details how SuDS can be integrated into the design and layout of development to offer wider environ

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																			mental benefits, and form part of the multi-functional green infrastructure provision. The Environment Agency's Approach to Groundwater Protection should also be considered, particularly statements G1 and G9 to G13 and National standards for sustainable drainage systems.

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0823-0018	Organisation	Pat	Abbott	Environment Agency	Yes	SD6	Yes		Yes		We are pleased to see an overall policy on Pollution Control (SD6). While we support Policy SD6, the section on Industrial Development could go further to encourage remediation of previously developed land. This is a sustainable approach which provides an opportunity for environmental improvement via remediation. Point 2 – states development proposals should be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibration. Whilst we support this part of the policy, we feel it would be strengthened if “should” was replaced with “must”. SP4 ensures physical infrastructure will support environmental objectives	We are pleased to see an overall policy on Pollution Control (SD6). While we support Policy SD6, the section on Industrial Development could go further to encourage remediation of previously developed land. This is a sustainable approach which provides an opportunity for environmental improvement via remediation. Point 2 – states development proposals should be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibration. Whilst we support this part of the policy, we feel it would be strengthened if “should” was replaced with “must”. SP4 ensures physical infrastructure will support environmental objectives which will include the WFD requirement for no deterioration, therefore new developments will mitigate	No	Not Answered		A	Supports policy SD6 but requests some modifications: Point 2 – states development proposals should be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity. This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibration. Whilst we support this part of the policy, we feel it would be strengthened if “should” was replaced with “must”. SP4 ensures	Support noted, see proposed modifications	2. Development proposals ~~should~~ must be located, designed and constructed in such a manner as to not be put at unacceptable risk from, be adversely affected by, or cause a significant adverse effect upon the environment, the health of new and existing residents or surrounding residential amenity.

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											which will include the WFD requirement for no deterioration, therefore new developments will mitigate pollution to water under SP4. Point 4 – We support the inclusion of this part of the policy which states ‘major development applications require a CEMP including prevention of pollution to watercourses.’ Paragraphs 21.52 and 21.53 - In the reasoned justification for policy SD6, we would like to see a merging of points 21.52 and 21.53 to prevent misunderstanding of the information. The AMP programme and SUDs provide improvements to water quality, but they are not limited to improvements under the Habitats Regulations. Paragraph 21.54 - We support the inclusion in the reasoned justification that infiltration SuDS are not appropriate on all locations, and the reference to CIRIA C753 SuDS Manual in design (21.54, 21.57). We further recommend that the following guidance is referenced within this policy: National standards for sustainable drainage systems on gov.uk, particularly Standard 4	pollution to water under SP4. Point 4 – We support the inclusion of this part of the policy which states ‘major development applications require a CEMP including prevention of pollution to watercourses.’ Paragraphs 21.52 and 21.53 - In the reasoned justification for policy SD6, we would like to see a merging of points 21.52 and 21.53 to prevent misunderstanding of the information. The AMP programme and SUDs provide improvements to water quality, but they are not limited to improvements under the Habitats Regulations. Paragraph 21.54 - We support the inclusion in the reasoned justification that infiltration SuDS are not appropriate on all locations, and the reference to CIRIA C753 SuDS Manual in design (21.54, 21.57). We further recommend that the following guidance is referenced within this policy: National standards for sustainable drainage systems on gov.uk, particularly Standard 4 water quality; The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13.					physical infrastructure will support environmental objectives which will include the WFD requirement for no deterioration, therefore new developments will mitigate pollution to water under SP4. Point 4 – We support the inclusion of this part of the policy which states ‘major development applications require a CEMP including prevention of pollution to watercourses.’ Paragraphs 21.52 and 21.53 - In the reasoned justification for policy SD6, we would like to see a merging of points 21.52 and 21.53 to prevent misunderstanding of the information. The AMP programme and SUDs provide improvements to water quality, but they are not limited to improvements under the Habitats		This may include by reason of pollution to land, air or water, or because of any form of disturbance including, but not limited to unacceptable levels of noise, light, odour, heat, dust and vibrations. 21.52 The Environment Agency's Thames River Basin Management Plan identifies

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											water quality; The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13. Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow.' For clarity we would recommend stronger wording of this sentence. This is suggested as, 'Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. However, there is the option for lined SuDS features to be installed, should site conditions allow.' Paragraph 21.57 – The current wording in this paragraph reads 'implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land or local water courses nearby, or further afield, or	Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed, should site conditions allow.' For clarity we would recommend stronger wording of this sentence. This is suggested as, 'Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. However, there is the option for lined SuDS features to be installed, should site conditions allow.' Paragraph 21.57 – The current wording in this paragraph reads 'implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land or local water courses nearby, or further afield, or					Regulations. Paragraph 21.54 - We support the inclusion in the reasoned justification that infiltration SuDS are not appropriate on all locations, and the reference to CIRIA C753 SuDS Manual in design (21.54, 21.57). We further recommend that the following guidance is referenced within this policy: National standards for sustainable drainage systems on gov.uk, particularly Standard 4 water quality; The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13. Paragraph 21.54 - reads, 'Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features		s that the lower Thames Estuary is of a moderate quality in terms of its ecological status and is failing to achieve a good chemical status. The Water Environment (Water Framework Directive) Regulations 2017 aims to secure no further deterioration of waterbodies and to ensure that the status of waterbo

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											result in adverse impacts to human health and residential amenity' We recommend a revision of the wording to include 'ensure any pollutants carried in surface water do not result in contamination of land or local water courses' to include ground water (21.57).	include ground water (21.57).					to be installed, should site conditions allow.' For clarity we would recommend stronger wording of this sentence. This is suggested as, 'Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. However, there is the option for lined SuDS features to be installed, should site conditions allow.' Paragraph 21.57 – The current wording in this paragraph reads 'implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land or local water courses nearby, or further afield, or result in adverse		dies is improved. Whilst the Thames Estuary is the main waterbody in Castle Point to which this applies, it also applies to all other main rivers in the Borough. 21.53 The Habitats Regulations Assessment identifies that new development is likely to impact on water quality... 21.54 ECC as the LLFA

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																	impacts to human health and residential amenity' We recommend a revision of the wording to include 'ensure any pollutants carried in surface water do not result in contamination of land or local water courses' to include ground water (21.57).		will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring. SuDS features should be designed in line with the updated Construction Industry Research and Information Association (CIRIA)

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																			SuDS Manual (CIRIA C753) and National standards for sustainable drainage systems , particularly Standard 4 water quality and The Environment Agency's Approach to Ground water Protection,particularly statements G1 and G9 to G13. Water quality Management guidance can be found

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																			within Chapter 26 of the manual. When choosing potential SuDS features , consideration around ground conditions and contamination is paramount. Infiltration SuDS must not be constructed in contaminated ground as they have the potential to provide a pathway for pollutants. Currently, the LLFA does not

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																			support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be installed , should site conditions allow. Evidence of pollution mitigation supplied must be demonstrated. 21.57 Industrial development may give rise to pollution to land and

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																			water, and/or result in disturbance to habitat sites. Due to the limited scale of industrial development, proposed studies have not focused on the impacts of this type of development in the Borough. These will be dealt with on a case-by-case basis in order to ensure that activities do not have an adverse impact on the

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																			environment or residential amenity. In particular, the implementation of SuDS in non-residential development proposals needs to be carefully considered, to ensure any pollutants carried in surface water do not result in the contamination of land, ground water or local water courses nearby, or further

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																			afield, or result in adverse impacts to human health and residential amenity.
0823-0019	Organisation	Pat	Abbott	Environment Agency	Yes	SD7	Yes		Yes		We are pleased to see an overall policy SD7 for dealing with land affected by contamination. We welcome the specific acknowledgement of ground water as a receptor. The requirement to manage contamination during development is clearly referenced in the desktop study and potential	We are pleased to see an overall policy SD7 for dealing with land affected by contamination. We welcome the specific acknowledgement of ground water as a receptor. The requirement to manage contamination during development is clearly referenced in the desktop study and potential intrusive site investigation, but we	Not Answered	Not Answered		A	Supports policy SD7 but suggests the following ammendments: but we suggest reference is added to published guidance: 'Developers should follow the risk management framework provided in 'Land	Support noted, see proposed modifications	21.62 Contaminated land could be created as a result of uses such as petrol stations, car

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											intrusive site investigation, but we suggest reference is added to published guidance: 'Developers should follow the risk management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.' Paragraph 21.62 – For clarity we recommend an addition to the reasoned justification to paragraph 21.62 and/or point 21.57 that 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'	suggest reference is added to published guidance: 'Developers should follow the risk management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.' Paragraph 21.62 – For clarity we recommend an addition to the reasoned justification to paragraph 21.62 and/or point 21.57 that 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'					Contamination: Risk Management', when dealing with land affected by contamination.' Paragraph 21.62 – For clarity we recommend an addition to the reasoned justification to paragraph 21.62 and/or point 21.57 that 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'		washes, sites used for industrial and commercial storage, and agriculture due to pollutants produced by the previous or existing site uses. It is important to ensure pollutants do not harm the health of the public or environment and that future development does not exacerbate these issues. Develop

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																			rs should follow the risk management framework provided in 'Land Contamination: Risk Management', when dealing with land affected by contamination.The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.

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0823-0020	Organisation	Pat	Abbott	Environment Agency	Yes	SD9	Yes		Yes		We acknowledge that the recent Future Homes Hub Water Efficiency report (Water Ready) (April 2024) (Future Homes Hub Water Efficiency Report), has been used to demonstrate the water efficiency reasoning within the draft Local Plan. Point 1 of the policy will require all new residential development to achieve a water efficiency standard of 90 litres person per day. Where it can be demonstrated this is not feasible part 2g and regulations 36(2) (b) of the building regulations will apply. We would recommend a clear definition of 'non feasibility' is include in the reasoned justification. A description of evidence required to show the non-feasibility should be included. Consideration needs to be given to how water use will be monitored against the 90 l/p/d target. We recommend you require a Water Efficient Design Statement to be submitted with the development application at the early stage Paragraph 21.70 – Provides the reasoned justification for a residential water efficiency target of 90 litres per person per day (l/p/d) in Castle Point, above	We acknowledge that the recent Future Homes Hub Water Efficiency report (Water Ready) (April 2024) (Future Homes Hub Water Efficiency Report), has been used to demonstrate the water efficiency reasoning within the draft Local Plan. Point 1 of the policy will require all new residential development to achieve a water efficiency standard of 90 litres person per day. Where it can be demonstrated this is not feasible part 2g and regulations 36(2) (b) of the building regulations will apply. We would recommend a clear definition of 'non feasibility' is include in the reasoned justification. A description of evidence required to show the non-feasibility should be included. Consideration needs to be given to how water use will be monitored against the 90 l/p/d target. We recommend you require a Water Efficient Design Statement to be submitted with the development application at the early stage Paragraph 21.70 – Provides the reasoned justification for a residential water efficiency target of 90 litres per person per day (l/p/d) in Castle Point, above the national baseline of 125 l/p/d and the optional higher standard of	Not Answered	Not Answered		A	Requests adoption of shared water standards and ammendments to the policy to reflect these	The shared water standards has been adopted and ammendments have been made to the policy as required (please see mods list).	N

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											the national baseline of 125 l/p/d and the optional higher standard of 110 l/p/d. The Water Ready report and the Shared Standards in Water Efficiency for Local Plans both show that this level is technically achievable through a fittings based approach, reduced demand, and, where appropriate, water reuse systems. We support this aspiration given the stresses on water supply in the area. Section 21.743 - States 'growth locations are known through this plan, Anglian Water can plan for that growth through their five-year Asset Management Plan'. It should be noted that the current AMP period, AMP8, runs from 2025-2030 and may not be able to incorporate new infrastructure improvements. It is important that where sufficient capacity is not available, construction or occupation phasing occurs, in line with policy SP4. Point 4 – States 'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This	110 l/p/d. The Water Ready report and the Shared Standards in Water Efficiency for Local Plans both show that this level is technically achievable through a fittings based approach, reduced demand, and, where appropriate, water reuse systems. We support this aspiration given the stresses on water supply in the area. Section 21.743 - States 'growth locations are known through this plan, Anglian Water can plan for that growth through their five-year Asset Management Plan'. It should be noted that the current AMP period, AMP8, runs from 2025-2030 and may not be able to incorporate new infrastructure improvements. It is important that where sufficient capacity is not available, construction or occupation phasing occurs, in line with policy SP4. Point 4 – States 'All new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water								

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											must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development'. We feel that "must" should be used in place of "should" in the first line. This will strengthen the policy and ensure that developers meet their requirements under the WFD legislations, ensuring no deterioration of watercourses through development. We support the wording that development applications 'Must include confirmation of ... capacity at the WRC that will serve the development'. And that confirmation of this must come from Anglian Water, the foul water undertaker.	Recycling Centre that will serve the development'. We feel that "must" should be used in place of "should" in the first line. This will strengthen the policy and ensure that developers meet their requirements under the WFD legislations, ensuring no deterioration of watercourses through development. We support the wording that development applications 'Must include confirmation of ... capacity at the WRC that will serve the development'. And that confirmation of this must come from Anglian Water, the foul water undertaker.							
0339-0001	Organisation	Sarah	Bowernan	Essex and Suffolk Water		SP3	Not Stated	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. In terms of water supply, water companies have a statutory obligation to meet and supply all domestic	Not Stated		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 and Suffolk Water (ESW) (www.eswater.co.uk/developers/large-developer/pre-planning-enquiry). We would be grateful if this could be made a requirement of your planning process. This will					A	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. To ensure we have a sufficient lead-in	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 Housing Topic Paper), which are publicly available. Whilst Councils can encourage	N

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								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.			allow us to assess the proposals and provide timely feedback before applications are formally submitted and considered by the planning authority. It is important to reiterate that Essex and 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.						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 & Suffolk Water (ESW) (www.eswater.co.uk/developers/large-developer/pre-planning-enquiry). We would be grateful if this could be made a requirement of 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. It is important to reiterate that Essex & Suffolk Water considers all applications across our entire operating area carefully, covering several	pre-application discussions, it is an optional, discretionary service and cannot be made a requirement. The constraints derived from unaligned geographic boundaries and of unaligned business and spatial planning timescales are noted.	

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																	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.		
0339-0002	Organisation	Sarah	Bowerman	Essex and Suffolk Water		HO U5	Not Stated	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.	Not Stated		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.					A	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	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.	N

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																	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	Instead of the Building Regulations, new park homes intended for permanent residential use must comply with the British Standard BS 3632 which promotes water efficiency through requirements for specific types of plumbing systems and water-using appliances, it does not use the same quantifiable l/p/d target or the same regulatory framework as Part G of the Building Regulations. The Council will encourage compliance with relevant water efficiency standards as	

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																		far as possible.	
0339-0003	Organisation	Sarah	Bowerman	Essex and Suffolk Water		SD9	Yes	We welcome Policy SD9 Water Supply and Waste Water. 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. 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 Anglian Water, Cambridge Water, Essex & 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	Yes		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. 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. 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				A	Welcome Policy SD9 Water Supply and Waste Water. Refers to the Shared Standards for Water Efficiency in Local Plans was published in June 2025.	Mod agreed with Essex CC as set out in the Scghedule of Mods and Statements of Common Ground with ECC and Essex and Suffolk Water	Y	

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								Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. The Shared Standards recommend that LPAs include Local Plan Policies that: • 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. • Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. • Require new major non-domestic developments to include water saving measures and water reuse in their design. 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			tied into Company Business Plans that are published every five years with the latest being published in 2025. Policy SD9 will support sustainable growth in Castle Point by promoting greater water efficiency in new developments, while longer-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.									

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								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.											
0339-0004	Organisation	Sarah	Bowernan	Essex and Suffolk Water		D3	Yes	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.	Yes		We note that both sites are intended to come forward later in the Plan period, and it is imperative to work collaboratively regarding the 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 and 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					A	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	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. Policy D3 - Master Planning 1. Where this	Y - additional reference to infrastructure providers , as set out in the Schedule of Modds,

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								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. 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. 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. However, we can confirm that we will not approve new mains water connections to data centres			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.							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 (Policies B8 and E1) 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	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 applicant to demonstrate how they have engaged with and sought the views of relevant landowner(s), key stakeholders, infrastructure providers and the local community.	

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								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.									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. 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. We note that both sites are intended to come forward later in the Plan period, and it is imperative to work collaboratively	Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement.	

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																	regarding the 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 & 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.		

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0683-0001	Organisation	Carl	Brampton	Essex Architectural Planning Limited	Yes	SP3	No	Does not meet Paragraph 32 of NPPF	No	Effective	Starting with Policy C1 – Canvey Town Centre, this proposes that a potential of 620 new homes could be constructed within the Town Centre whilst retaining its commercial areas. However, there is little free land availability within the area identified by the Draft Local Plan. This can only mean one thing, an increase in the height of the building to become a more urbanized town. On the outset, you may think that this seems a reasonable and good use of brownfield development sites. But there appears to be a clear lack of understanding of the practicality of this style of development. Canvey Island has poor soil conditions which means that we must build here on Raft Foundations. However, the soil conditions limit the amount of development that can be achieved, typically 3 storey buildings. There are a couple of slightly taller buildings, but you won't find anything here on Canvey over 4 stories. Existing buildings in the area would've been constructed with foundations that are only	The viability of developments need drastic review including the 5 year sustainable supply of housing.	No	Not Answered	Not Answered	A	Density and capability of building tall buildings on canvey Charfleets Flood Risk on canvey Third Road off Canvey Infrastructure	Density The densities chosen for the sites within the Plan were informed by the Density and Capacity Study July 2025, please see this for further details. The Plan has taken into account the constraints on Canvey with regards to foundations and has not proposed heights above 31/2 stories on Canvey Island for this reason. Charfleets Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated	N

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											suitable for this number of floors at the most. So, there is simply no way that the existing buildings would be able to accommodate multiple floors of development. And then where do you place all the parking spaces for this additional development if you are going above the existing properties? The heart of the Town is the Knightswick Centre, a building which is in much needed refurbishment and updating to support the local community. Within the Castle Point Issues and Options document released in 2024, it indicated that this could have potential for 140 homes, which I think is reasonable. However, the council has just signed an agreement which sees them spend £2million on a refurb, only to then suggest they may need to knock it down to build homes within this local plan! The expenditure of this amount of taxpayer funds raises concerns about the long-term strategies surrounding the development of the town centre. Moving on to the biggest issue with this Local Plan, Policy C4 – West Canvey.														that there is no reasonable prospect for the site to be used for these purposes'. This policy will apply until such time as a master plan for West Canvey has been developed. Policy E1 may subsequently change in terms of its approach to Charfleets when the Castle Point Plan is reviewed in 5 years’ time, to enable the delivery of the West Canvey regeneration. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in	

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											The proposal here includes the entirety of Charfleets Industrial, Morrisons and a field west of Roscommon Way that could be suitable for up to 2,700 new homes, apparently. 2000 of which is going to be allocated within this Local Plan up to the year 2043. What the plan fails to consider is how this would even be feasible. Charfleets Industrial Estate is the centre of Canvey Island’s employment and commercial industry. So, what is going to happen to the businesses and employment within this area when you are looking to replace large portions of this? How exactly is this even going to be feasible with so many landowners, businesses and other parties that would be affected by development. Being part of this community on Canvey Island, I like many others would be extremely concerned about the potential impact it will have upon this area and the businesses which support the local economy. What is even more concerning is that the Local Plan suggests that this housing development														the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Third Road off Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements	

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											should be provided at a density of around 150 dwellings per hectare. To put that in perspective, in Essex the average density is around 65 dwellings per hectare. Here on Canvey Island, it is much less. Canvey Island has approximately 16,000 homes, in a development area of around 675 ha as you can see from the map below. This includes some of the green spaces, but I've removed areas such as Smallgains, Waterside and Charfleets to make it a fair comparison. This provides around 23 dwellings per hectare. What they are proposing on the Charfleets area would increase the density of the area by 7 times what is present on Canvey Island! This severe increase in density will change the composition of Canvey Island completely. This will have a dire effect on the character of the Local Area and Canvey Island as a whole, something that a Local Plan should seek to protect. Lastly, I want to touch upon the infrastructure upon Canvey Island and the impact that this will have							for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in	

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											upon the local area. Canvey Islands issues typically surrounding Traffic, Drainage and Flooding. Drainage and Flooding are serious concerns for the residents of Canvey. As someone that has been involved in developing new properties on the island, I do believe that these can be mitigated with good design. This must be supported, however, with considerably investment by the Local Authority and Drainage Companies, which has been the main issue over the past years. Traffic is simply something that cannot be mitigated against without a Third Road existing Canvey Island. This is something that the Local Plan fails to provide. The Council’s suggestions for resolving this major issue are to provide some additional cycle routes, pedestrian crossings, changing some junctions and re-routing some bus services. This simply will not change anything, especially if they plan to provide a further 3000 homes, which would provide for around 10000 additional occupants.														the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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											It was only this weekend when evidence of this was clear. A major accident occurred on Canvey Road which then prevented access along this route. The delays then meant there was only one route onto the Island which caused heavy congestion for many hours. The suggested alterations simply would not resolve this issue. I'm yet to even touch upon other community infrastructure that Canvey Island lacks such as Doctors, Dentists and School Places. None of this appears to be considered appropriately within The Local Plan. This is evident where in Policy C4 it suggests that only 56 nursery places and 0.13 hectares of land is provided for primary school provision. This is to support 2000 homes and potentially 6000 people. This is simply inadequate.								
0282-0001	Organisation	Kevin	Fraser	Essex County Council	Yes	Whole Plan	No	Not consistent with National Policy	No	Not Justified, Not Consistent, Not Effective, Not positive	Appendix A. Policy Context (Not Sound - Effective): 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		Yes	Not Stated	Yes, ECC supplied 8 additional appendices	B	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	Accepted Additional clarification but shortened text added as requested to provide clarity.	Essex County Council is the Minerals Planning Authority for Castle Point Borough

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											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).				containing various pieces of evidence		and Mineral and Waste Consultation Areas and the potential requirement for a Mineral or Waste Infrastructure Impact Assessments		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. Essex County Council must be consulted on all non-mineral

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																			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 distance of 250m around

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																			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)

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																			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

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																			Centre. A Waste Infrastructure Impact Assessment will be required for any development within these thresholds to ensure there is no adverse impact on their existing or future operation.

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0282-0002	Organisation	Kevin	Fraser	Essex County Council	Yes	Vision	No	ECC welcomes the inclusion of Objective 18, which refers to “well-designed homes that meet local needs in terms of quantity, affordability and any accessibility requirements.” This aligns with ECC’s strategic priorities around inclusive housing and accessibility. 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. The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point, including: • 1,056 retirement/sheltered housing units • Approx. 710 market units • Approx. 346 affordable/social rent units • 594 extra care housing units • Approx. 385 market units	No	Effective	ECC welcomes the inclusion of Objective 18, which refers to “well-designed homes that meet local needs in terms of quantity, affordability and any accessibility requirements.” This aligns with ECC’s strategic priorities around inclusive housing and accessibility. 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. The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point, including: • 1,056 retirement/sheltered housing units • Approx. 710 market units • Approx. 346 affordable/social rent units • 594 extra care housing units • Approx. 385 market units • Approx. 209 affordable/social rent units • 139 nursing care beds • 138 residential care beds	Replace Objective 18 with following text “ <i>Provide well designed homes that meet local needs in terms of quantity, affordability, care, support and accessibility and any accessibility requirements.</i> ”	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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. For the Vision and Objectives to incorporate findings from the recently published evidence from The Specialist Housing and Accommodation Needs Assessment (SSHANA, July 2025). 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	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. 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 Noted	Replace with following text “Provide well designed homes that meet local needs in terms of quantity , affordability, care, support and accessibility and any accessibility requirements.” Replace with the following text “Secure improved health and wellbeing outcomes for residents enabling more

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											• 158 wheelchair-accessible homes (M4(3)) • 15 residential placements for Children in Care 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. 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. 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						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.			active and healthier lifestyles, creating healthy Living environments and reducing health inequalities ensuring inclusive communities

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											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. 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. 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. The Vision and Objectives do not explicitly acknowledge the borough’s need for affordable specialist accommodation.								

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											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. 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. 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.									

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											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. 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. While GBI is captured within the environmental objectives and chapter, it is important in the delivery of								

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											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 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.								

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0282-0003	Organisation	Kevin	Fraser	Essex County Council	Yes	SP1	No	3. Effective 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 The ELNRS includes two key map types: • Areas of Particular Importance for Biodiversity (APIBs): Nationally and locally designated sites. • Opportunities Mapping: - o Strategic Opportunities – Areas with potential for habitat creation (e.g. woodland, grassland, scrub, freshwater, coastal and marine). - o Potential Opportunities – Urban and other areas where habitat creation could be beneficial. APIBs are not included within the opportunities mapping. Therefore, the Strategic Combined Opportunity Areas are not statutory designations, so do not have the same weighting, but they are strategic priorities for	No		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. 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	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 these thresholds to ensure there is no adverse impact on their existing or future operation.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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”. 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. Supports the reference to Essex Green Infrastructure Strategy and GI standards. Points out that the ELNRS	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 plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation... it then goes on to say that (Local Planning Authorities) “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	1.... Ensuring those areas identified as Strategic Combined Opportunity Areas are safeguarded protected and enhanced to deliver the additional nature benefits identified to create new connections between habitat areas; 2. Identifying new urban greening opportunities within and

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								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.			Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites. 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. ECC support reference to the Essex Green Infrastructure Strategy and GI Standards in paragraph 6.5 as evidence of 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						identifies priority areas as well. Typo missing “t” on requirement The ELNRS is one tool of a number which contribute to the biodiversity duty Supports the view that Green Belt has wider benefits from preventing urban sprawl, it also supports nature conservation and delivery of green and blue infrastructure and references Kirby Scott and Walsh study Landscape and Urban Planning March 2025	considers to be of greater importance. “ This position is further supported by Section 40 & 41 of the NERC Act 2006. 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 The Essex Biodiversity Net Gain Evidence for Need Aug 2024 refers to the difficulties that isolated	adjacent to the existing urban areas to deliver multi-functional green infrastructure that provides nature-based enhancements, habitat resilience and climate resilience It also has a key role to play in the overall quality of the environment in South Essex as evidenced by the Essex Local Nature Recovery Strategy

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											the plan. 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. 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 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. To support this approach,								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 will provide the most benefits for nature recovery over onsite biodiversity improvements (those within the red boundary), where quality would be compromised. Castle Point is a small borough of approximate 17 square miles with a population density of circa 5000 per square mile,	, South Essex Green and Blue Infrastructure Strategy , Essex Green Infrastructure Strategy and Green Infrastructure Standards and the associated proposals for the SEE Park. Remove school playing fields from open space designation Proposed text amendment to criteria 1 Ensuring those areas identified as

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											the study “A Greener Green Belt? Co-developing Exploratory Scenarios for Contentious Peri-Urban Landscapes” 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. https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont													consequently its biodiversity uplift opportunities are more limited than other local authority areas. 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. 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-	Strategic Combined Opportunity Areas are safeguarded protected and enhanced to deliver the additional nature benefits identified to create new connections between habitat areas; “protect and enhance” should replace ‘enable and support’ in policies C1, C4, C6, C8 & C9 etc. South Benfleet

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																		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 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. Accepted: The Council agrees that the ELNRS is an important document in identifying opportunities for improving the natural environment and works in tandem with the Essex Green Infrastructure	(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.

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																		Strategy and GI Standards Noted and Corrected: 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. Noted: The Council agrees that the Green Belt provides for wider benefits	
0282-0004	Organisation	Kevin	Frasier	Essex County Council	Yes	SP2	No	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. ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a	No		ECC require Criteria 3b is amended to read: Support the delivery of well-designed neighbourhoods, which enhance the local environment, enable urban greening, to create places where people want to live, work, and visit now and in the future;		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Recommends the addition of urban greening to be included to deliver well-designed neighbourhoods that enhance the local environment 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.	Accepted: The Council agrees that urban greening provides opportunities for creating attractive neighbourhoods.	3b. Support the delivery of well-designed neighbourhoods , which enhance the local environment, enable urban greening , to create places where people want to

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								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.											live, work, and visit now and in the future
0282-0005	Organisation	Kevin	Frasier	Essex County Council	Yes	SP3	No		No	Justified, consistent with national policy	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 “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.” 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	ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Co-operate and the IDP given: • the IDP May 2025 is not based on the infrastructure requirements required to deliver 6,196 homes in Policy SP3 but three growth scenarios between 4,862 to 8,845 homes; • 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; • 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	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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. 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	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 . 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	Housing Supply at April 2023 2025 Thorney Bay (transitioning to Sandy Bay)

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											significant unmet housing need of around 5,500 homes. 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. CPBC have held meetings under the duty to cooperate with its neighbours within the Strategic Housing Market Area, 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. Implementing the Duty to co-operate and the preparation of Statements of Common Ground is the most constructive approach to progress the	and childcare to inform, policy requirements; the IDP and Whole Plan Viability Assessment. 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. ECC recommend the Table supporting Policy SP3 is updated to read: Housing Supply at April 20253 ECC recommend consideration is given to the phased delivery of supported and specialist housing as set out in the SSHANA. ECC require Criteria 1 is deleted. 1. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development. ECC require Criteria 2 is amended to read: Where necessary, the Council will seek 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					its unmet need. Recommends SoCG prepared. Notes that evidence has been put forward to support CPBC housing strategy but queries its robustness and transparency in light of the 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 j `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.	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. 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. 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. Unmet Housing Need has been considered	

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											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 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: • 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). • the inconsistent reference to the 'severe' impact of growth on the highway network – the TA refers to 'significant impact' and	provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan.					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. 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. 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 that	through the SEC and directly with neighbouring authorities. Relevant Statements of Common Ground have been put in place Ultimately, the soundness and legal compliance of the Castle Point Plan and its evidence will be decided at examination. 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. 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	

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											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. • 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 `safeguarded' in Policy SP1 rather than `enable and support'. PPG refers to Planning Practice Guidance states in preparing local plans the LPA has a legal duty to `have regard to' the relevant strategy for their area. A key role of ECC is to maintain high quality infrastructure to support a						CPBC has not met its duty to cooperate on this matter. 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		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. 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. CPBC will provide ECC the updated Transport Assessment to review prior to	

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											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". 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						proposed housing strategy, as set out in the Reg 19 Plan. 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. 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. 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	submission of the Castle Point Plan for examination. The IDP will be updated to include all latest information and evidence for ECC review.Accepted amendment to table made. Noted Housing trajectories to consider the provision of supported and specialist housing Accepted. Accepted and additional text added for clarity	

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											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. 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 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 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							Plan. As a result EEC considers that CPBC has not met its duty to cooperate on this matter. 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		

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											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). 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,						infrastructure impacts of the proposed housing strategy, as set out in the Reg 19 Plan. 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. 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,		

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											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. 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: • Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined). • 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. 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'						which require to be addressed prior to submission and its impact on the Plan and supporting IDP Requests an amendment to table title for consistency with monitoring position in Housing Topic Paper April 2025 Recommends that consideration should be given to the trajectory of supported and specialist housing within its housing strategy		

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											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”. 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									

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											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. 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. 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. 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								

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											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. 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. 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. This amendment would be consistent with Strategic								

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											Policy SP2, criteria 3a which states: a. Provide or make a proportionate financial contribution to the delivery of necessary infrastructure alongside growth; And Policy Infra2, criteria 2 which states: 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.								

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0282-0005	Organisation	Kevin	Fraser	Essex County Council	Yes	SP4	No		No	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. 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. For clarity, criteria 2 should make it clear that a development can be made acceptable in planning terms through direct	Criteria 1 is deleted The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development. Delete text for Criteria 2 and replace with: Where necessary, the Council will seek 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.					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. Supports this policy, but greater clarity in criteria requiring that developers make direct provision and/or proportionate contributions towards infrastructure needs.	Accepted. Accepted and additional text added for clarity	1. The Infrastructure Delivery Plan identifies the infrastructure required to meet the demand of new development. 2. Where necessary, the Council will seek developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development

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											provision and/or proportionate contributions rather than only contributions. This amendment would be consistent with Strategic Policy SP2, criteria 3a which states: • Provide or make a proportionate financial contribution to the delivery of necessary infrastructure alongside growth; And Policy Infra2, criteria 2 which states: 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.								proposals 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

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																			that the required infrastructure to support the development will be delivered in a timely, and where appropriate, phased manner.
0282-0006	Organisation	Kevin	Fraser	Essex County Council	Yes	C1	Not Stated		No	Effective	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. The reasoned justification could refer to the Nature Towns and Cities accreditation launched in 2025 (https://naturetownsandcities.org.uk/)	The reasoned justification could make reference to the Nature Towns and Cities accreditation launched in 2025 (https://naturetownsandcities.org.uk/) ECC require an amendment to paragraph 8.20 to read: `....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, which could support skills development of the local community . ECC require paragraph 8.22 is amended to read: There is scope within this area to increase tourism activities, including access to Thorney Bay Pavillion,	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policy suggests adding a reference to Nature Towns and Cities within the justification Supports policy to provide access to high quality safe and convenient walking and cycling routes within Canvey Town Centre 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 and reference added 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 & Cities. Where there are opportunities to	14. Development proposals must satisfy the requirements of the habitats regulations and must be designed to protect and enhance ~~enable~~ ~~and~~ support the habitat priority measure

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											es.org.uk/). 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. https://naturetownsandcities.org.uk/ .3. Effective 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. The reasoned justification could refer to the Nature Towns and Cities accreditation launched in 2025 (https://naturetownsandcities.org.uk/). 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. https://naturetownsandcities.org.uk/	through some additional business growth in the leisure and food and drink offer, and through the utilisation of public spaces including the park, the bandstand, and the beach.										provide flexible... Officer additional text added to 8.17 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 No Mods Amend final sentence to 8.20 read: 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, which could support skills development of the local community .munity	s identifie d within the Strategi c Opportu nities set out in the Essex Local Nature Recover y Strategy (LNRS). (Para 8.17) There will be a need for local access to open spaces as well as space for visitors. There is also an opportu nity to provide landscap ing, green space and nature improve

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											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)								ments for the benefit of residents and wildlife useful guidance can be found in Home - Nature Towns & Cities. Where there are opportunities to provide flexible ... (Para 8.20) ... to the town centre from the north and east. Redevelopment of Canvey Town Centre also provides opportunities for landsc

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																			ping and biodiversity improvements to this area to create attractive green spaces and planting for residents to enjoy. : The Paddock 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, which could support skills develop

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																			ment of the local community. (Para 8.22) There is scope within this area to increase tourism activities, including access to Thorney Bay Pavillion , through some additional business growth in the leisure and food and drink offer, and through the utilisation of public spaces including the

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																			park, the bandstand, and the beach.
0282-0007	Organisation	Kevin	Fraser	Essex County Council	Yes	C1	Not Stated		Yes		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.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policy to provide access to high quality safe and convenient walking and cycling routes within Canvey Town Centre 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 Supports policy suggests to add reference to Thorney Bay as an asset for increasing tourism and business growth.	Noted Accepted CPBC agrees that the Paddocks can provide opportunities to support skills development in the community Accepted CPBC agrees that Thorney Bay Pavillion can be an asset for increasing tourism and supporting business growth.	
0282-0008	Organisation	Kevin	Fraser	Essex County Council	Yes	C1			Yes		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		Yes	Not Stated	Yes, ECC supplied 8 additional	B	Supports policy. Suggests adding a reference to https://naturetownsandcities.org.uk/ as this would further strengthen	Accepted and put reference to https://naturetownsandcities.org.uk/ in the justification at paragraph 8.13	

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											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.				l appendices containing various pieces of evidence		this policy by demonstrating how this could be achieved.		
0282-0009	Organisation	Kevin	Frasier	Essex County Council	Yes	C3	Yes		No	Effective	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		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Supports policy that redevelopment and change of use or materials should be made in accordance with policies ENV3 and SD1	Noted:	

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0282-0010	Organisation	Kevin	Fraser	Essex County Council	Yes	C4	Not Stated		No	Positively prepared, justified, effective	1. Positively Prepared 2. Justified 3. Effective 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. 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. 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. 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).	ECC will need to undertake a cumulative assessment of the growth, 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) to inform an updated IDP. Any cumulative assessment will need to inform the Plan, site policies, an amended IDP and Whole Plan Viability Assessment. ECC needs to ensure that the delivery of ECC’s infrastructure and services are commensurate with the growth being planned. Further assessment will be undertaken to support individual planning applications once the detailed housing mix has been determined by the developer. ECC require Criteria 10 is amended to read: Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Combined Opportunity Areas Opportunities set out in the Essex Local Nature Recovery Strategy (ELNRS).	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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 provision for 2,700 homes at West Canvey and this policy and the IDP will be updated according to the results of that assessment. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted. GBI, biodiversity and climate change should be considered at the outset of any development design. Additional reference to ‘protect and enhance’ Strategic Combined	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.	Remove criteria 8 and replace with A new 72 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.22 ~~0.13~~ hectares of suitable land and a new 56 place stand-alone early years and childcare nursery (Use Class E(f)) on 0.18 hectares of suitable land allocated for

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											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. 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 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.							Opportunity Areas' consistent with proposed change to Policy SP1 and to `protect' APIBs	education and childcare use provision Amend Criteria 10 to read: Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Combined Opportunity Areas Opportunities as well as protect Areas of

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																			Biodiversity Importance set out in the Essex Local Nature Recovery Strategy (ELNRS) .
028 2-001 1	Organisation	Kevin	Fras er	Essex County Council	Yes	C5	Not Stated		Yes		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: • Canvey Access Improvement to enhance connectivity to and from the island by all modes of transport to improve	ECC welcome reference to ECC being a potential partner in any future feasibility project to improve access to Canvey Island as this is consistent with the emerging LTP4 and South Essex Implementation Plan.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	EEC welcomes its proposed involvement in any future Canvey Island improved access feasibility study. The emerging Local Transport Plan includes scheme ideas for improving access to Canvey Island, have not been subject to feasibility or have any funding.	Noted:	

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											sustainable access and ease traffic congestion. This would improve access to services, health and wellbeing, and access to employment. • 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. • 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.								
0282-0012	Organisation	Kevin	Fraser	Essex County Council	Yes	C8	Not Stated		No	Effective	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. 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'		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of	B	Any development at Residential Park Home Sites would require to be included in cumulative assessment for primary education and early years provision.	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	e. Development proposals must be designed to protect and enhance ~~enable~~ and ~~support~~ the habitat priority measure

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											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.				evidence			from the Residential Park Home Sites. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.	s identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
0282-0013	Organisation	Kevin	Fraser	Essex County Council	Yes	B1	Not Stated		No	Not Stated	ECC seek an additional criteria to make reference to greening the town centre and providing biodiversity net gain at street level and above consistent with Policy C1, criteria 10.	ECC require an additional Criteria to read: Opportunities for greening the town centre and providing biodiversity net gain at street level and above	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Require additional criteria to reference greening town centre and providing biodiversity net gain	Accepted and additional criteria added to policy	4. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out

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																			in the Essex Local Nature Recovery Strategy (LNRS). 5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above
0282-0014	Organisation	Kevin	Frasier	Essex County Council	Yes	B2	Not Stated		No	Effective	ECC seek an additional criteria to make reference to greening the town centre and providing biodiversity net gain at street level and above consistent with Policy C1, criteria 10. ECC welcome reference to the topography as being a potential barrier to active travel use from Benfleet Station to the north east 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	ECC require an additional Criteria to read: Opportunities for greening the town centre and providing biodiversity net gain at street level and above 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. ECC seek paragraph 9.9 includes an additional travel outcome to read:	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Require additional criteria to reference greening town centre and providing biodiversity net gain 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	Noted Accepted. Further work would be required through the planning process. Reference made to the provision of a mobility hub at Benfleet Station	5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above

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											Down and Hadleigh Country Park. 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 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.	Create a mobility hub at Benfleet Station			enc e		feed into how the Schedule of Interventions relate to specific development sites and/or clusters to feed into any future update to the IDP. Transport improvements in Benfleet will require further assessment to ascertain how they 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		
0282-0015	Organisation	Kevin	Fraser	Essex County Council	Yes	B6	Not Stated		No	Effective	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. ECC notes that the site allocation is within a Waste Consultation Area in relation to a waste site on Armstrong Road (ref	ECC require an additional Criteria to read: Undertake a Waste Infrastructure Impact Assessment ECC require the reasoned justification is amended to read: 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.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evid	B	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 The site is within a Waste Consultation Area at Armstrong Road and a Waste Infrastructure Impact	Accepted and additional text added requiring a Waste Infrastructure Impact Assessment Accepted and additional text added requiring a Waste Infrastructure Impact Assessment in the reasoned justification	Add additional Criteria 5. A Waste Infrastructure Impact Assessment is undertaken given the site is located within a Waste

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											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.				ence		Assessment would be required. This should be referenced in the reasoned justification		Consultation Area in relation to the waste site on Armstrong Road. See above additional criteria added ECC require the reasoned justification is amended to read: The site is located within a Waste Consultation Area regarding the waste site at Armstrong Road. As a result, a

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																			Waste Infrastructure Impact Assessment should be undertaken
0282-0016	Organisation	Kevin	Fras er	Essex County Council	Yes	B8	Not Stated		No	Effective	ECC seek Criteria 4 also makes reference to providing biodiversity net gain to be consistent with other plan policies.	ECC require Criteria 4 is amended to read: Improved public realm which creates space for pedestrians and cyclists to move around. The public realm strategy should integrate urban greening, biodiversity net gain and incorporate sustainable drainage into the approach to materials and landscaping.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to providing biodiversity net gain for this policy	Accepted and additional text added requiring biodiversity net gain	4. Improved public realm which creates space for pedestrians and cyclists to move around. The public realm strategy should integrate urban greening, biodiversity net gain and incorporate sustainable drainage into the approach to material

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																			s and landscaping 8. Development proposals must be designed to protect and enhance enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
0282-0017	Organisation	Kevin	Fraser	Essex County	Yes	Had 1	Not Stated		Yes		ECC support reference to opportunities for urban greening in the town centre (Criteria 8). Town centres present a valuable		Yes	Not Stated	Yes, ECC supplied 8	B	EEC supports this policy and reference to opportunities for urban greening in	Accepted and additional text referring to urban greening added	Improved environmental conditio

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				Council							opportunity for urban greening, which can enhance public spaces, improve biodiversity, and support climate resilience. This could include greening streets, 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				additional appendices containing various pieces of evidence		Hadleigh Town Centre		ns including urban greening can help the attractiveness of the centre town centre along with an improved evening and leisure offer. Useful guidance can be found in Home - Nature Towns & Cities. A banking hub is also desired to enable residents and local businesses to have access to shared banking

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																			services .
0282-0018	Organisation	Kevin	Frasier	Essex County Council	Yes	Had 1	Not Stated		No	Effective	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.	ECC require Criteria 6 is amended to read: A car parking strategy that provides the level of car parking required to meet foreseen demand and accessibility between commercial areas and car parking having regard to the EPOA Parking Guidance.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	6. A car parking strategy that provides the level of car parking required to meet foreseen demand and accessibility between commercial areas and car parking having regard to the EPOA Parking Guidance. 11. Development proposals must be designed to protect and enhance

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																			enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
0282-0019	Organisation	Kevin	Fraser	Essex County Council	Yes	Had 2	Not Stated		Yes		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		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evid	B	Supports policy for requiring proposals to improve recreational facilities at Hadleigh Country Park and their maintenance consistent with other policies in the Plan.	Noted	Development proposals must be designed to protect and enhance enable and support

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											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.				ence				
0282-0020	Organisation	Kevin	Fraser	Essex County Council	Yes	Had 4	Not Stated		No	Effective	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.	ECC require an additional Criteria to read: Opportunities for providing multifunctional green infrastructure and biodiversity net gain	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	Provides opportunities for multifunctional green infrastructure and biodiversity net gain

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															ence				
028 2-002 1	Organisation	Kevin	Fraser	Essex County Council	Yes	Thun1	Not Stated		No	Effective	ECC seek an additional Criteria is included referencing the need for urban greening and biodiversity net gain consistent with Policy C1, criteria 10.	ECC require an additional Criteria to read: Opportunities for greening the centre and providing biodiversity of net gain at street level and above.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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 Provides opportunities for greening the centre and biodiversity of net gain at street level and above.
028 2-002 2	Organisation	Kevin	Fraser	Essex County Council	Yes	Thun2	Not Stated		Yes		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	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of	B	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.	

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															evidence				
028 2- 002 3	Organisation	Kevin	Fras er	Essex County Council	Yes	Thun2	Not Stated		No	Effective	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. This will confirm the potential requirement for a new 56 place nursery to meet local demand. 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". Paragraph 11.16 highlights that parts of the site experience surface water	ECC require Requirement 2 is amended to read: A new 56 place stand alone early years and childcare nursery (Use Class E(f)) on 0.183 hectares of suitable land allocated for education use ECC require a new Criteria to read: How SuDS will be incorporated into the masterplanning of the site in accordance with Policy SD3 ECC require an additional criteria to read: Opportunities for greening the centre and providing biodiversity of net gain at street level and above.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	A further cumulative assessment is recommended to assess the early years provision requirement as a result of development at Kiln Road 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 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.	Accepted. 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 requirements on the development proposals at Kiln Road Campus. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted an additional criteria has been added to require SuDS to be considered as part of the master plan process for the site. Accepted.	Amend criteria 2 to read A new 56 place stand alone early years and childcare nursery on 0.13 hectares (Use Class E(f)) on 0.18 hectares of suitable land allocated for education use Development proposals must be designed to protect and enhance ~~enable~~ and

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											challenges. Consequently, it is essential that any masterplanning 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. 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. For clarity, an additional criteria should be added requiring developments to demonstrate the delivery of GBI and BNG. This ensures that environmental enhancements are not just implied but actively							Agreed that scheme designs should be landscape led and masterplans should be approved by CPBC prior to submission of the planning application. Given additional criteria 9 and 10 existing criteria 9 is amended to criteria 11.	support the habitat priority measures identified within Strategic Opportunities set out the Essex Local Nature Recovery Strategy (LNRS) Proposals should demonstrate how SuDS will be incorporated into the master planning of the site in accordance with Policy SD3 Provide opportunities for greening

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											integrated into the design and delivery of development.								the centre and biodiversity of net gain at street level and above
0282-0024	Organisation	Kevin	Fraser	Essex County Council	Yes	Thu4	Not Stated		Yes		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.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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.	
0282-0025	Organisation	Kevin	Fraser	Essex County Council	Yes	Hou4	Not Stated		Yes		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: • Criteria 1a - 100% of all		Yes	Not Stated	Yes, ECC supplied 8 additional appendices	B	Supports Policy Hou4 which aligns with Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA 2025)	Noted	2a. Proposals that contribute towards the delivery of 1,056 retireme

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											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 • 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. • 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 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				ces containing various pieces of evidence					nt/sheltered homes and 594 extra care units for older people which should have regard to the Essex Supported and Specialist Housing and Accommodation Needs Assessment (2025) and provide mixed tenure of market and affordable/social rental over the Plan period in locations with good access

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											inclusive, community-based care.								to shops and services . Development proposals for extra care accommodation should refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement in their designs.
0282-0026	Organisation	Kevin	Fraser	Essex County Council	Yes	Hou4	Not Stated		No	Effective	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: • Part 2a – reference to quantified targets for 1,056 retirement/sheltered homes and 594 extra care units for older people; However, the following concerns raised in the	ECC requires the following amendment to ensure it is consistent with national policy and ECC's statutory duties. Amend Part 2a to specify the market/affordable social rent tenure split for retirement and extra care housing, as evidenced in the SSHANA (2025). ECC requires the following amendment to Criteria 2b ensure it is consistent with national policy and ECC's statutory duties and to	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various	B	Supports Policy HOU4 Specialist Housing Requirements but the policy needs to distinguish between market and affordable/social rent provision in criteria 2a for HOU4 Need to reference the Supported Specialist Housing Needs Assessment	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	

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											Regulation 18 Plan still need to be addressed, namely: • 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. 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: • Part 2b - reference to quantified targets for 138 residential care beds, and 139 nursing care beds; 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 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 young people including care	reflect the SSHANA (2025) figures. Proposals that contribute towards the delivery of 138 residential carebeds and 139 extra nursing care beds over the Plan period. ECC require the evidence base supporting this policy should also refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023).			pieces of evidence		(May 2025) when considering Castle Point's housing needs Supports Policy Hou4 requires clarification on term nursing care beds to align with SSHANA	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.. It is required that future development proposals should have regard to the tenure requirements set out in the SSHANA within their planning application process. These requirements are: • Retirement /sheltered housing (1056 homes) of which 802 are market housing and 253 affordable/social housing • Extra care housing (594 homes) of which 421 homes are market housing and 173 homes	

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											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.							are affordable/social housing Accepted wording changed from extra care beds to nursing care beds Accepted references to ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023) added Accepted and referenced made to SHHANA (2025)	
0282-0027	Organisation	Kevin	Fraser	Essex County Council	Yes	Hou6	Not Stated		Yes		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.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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.	

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0282-0028	Organisation	Kevin	Fraser	Essex County Council	Yes	E1	Not Stated		No	Effective	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: 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. 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.	ECC require Criteria 2 is amended to read: Within Strategic Employment Areas, and until such time as a Master Plan is approved ECC require the following addition to the Reasoned Justification to read: 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 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.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Masterplans should be approved by the council prior to determination of any planning application Add the Experian Land Demand Forecast for Castle Point September 2024 to the evidence base	Accepted CPBC agree that masterplans should be approved prior to any planning application Accepted reference added	Within Strategic Employment Areas, and until such time as a Master Plan is approved agreed, Class B development or other 'sui generis' uses will be supported which: f. Development proposals must be designed to protect and enhance enable and support the habitat priority measures

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																			identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
0282-0029	Organisation	Kevin	Fraser	Essex County Council	Yes	E3	Not Stated		No	Effective	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. 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	ECC require Criteria 1 is amended to read: Require major developments to be supported by Employment education and Skills Plans that demonstrate how local training and employment opportunities will be delivered by the development during the construction phase. ECC require the following addition to the Reasoned Justification to read: 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	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Need to specify that major applications need to provide employment and skills plans with their applications Add reference to the Essex and Thurrock Skills Improvement Plan (2023)	Accepted additional text requiring employment and skills plans with major applications Accepted and reference added.	1. Require major developments to be supported by Employment education and Skills Plans that demonstrate how local training and employment opportunities will be delivered by the

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											authorities to meet the evolving needs of the local economy.	careers guidance, and 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.							development during the construction phase. These will be secured as part of the S106 agreement. 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

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So un d?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
																			boosting soft skills, enhancing green skills for a low-carbon economy, developing digital skills, expanding apprenticeships, improving careers guidance, and simplifying the landscape for training providers and employers. The plan emphasises stronger partnerships between employers, training providers, and

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																			local authorities to meet the evolving needs of the local economy.
0282-0030	Organisation	Kevin	Fraser	Essex County Council	Yes	TC5	Not Stated		No	Effective	ECC welcome references to the role of unhealthy food advertising within Policy TC5. To provide additional detail to statements around local obesity ECC seek reference is made to the National Child Measurement Programme (NMCP) in paragraph 15.32. 3. Effective 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. ECC welcome references to the Essex Healthy Weight	ECC require paragraph 15.31 is amended to read: The national Obesity Strategy highlights that eating out can contribute towards obesity through the consumption of out of home food high fat, salt and sugar (HFSS). Takeaways and promotions in food stores and high street environment can also add to the number of calories consumed. ECC require paragraph 15.32 is amended to read: This is significant in Castle Point where obesity levels are higher than the national average, with insight from the annual National Child Measurement Programme (NCMP) which monitors the Body Mass Index (BMI) of children in reception and year six. ECC require reference is made to the Castle Point and Rochford Health and Wellbeing Strategy in paragraph 15.37. ECC require paragraph 15.36 is amended to read:	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	in our town centres and local communities. The national Obesity Strategy highlights that eating out can contribute towards obesity through the consumption of calories out of home food which is high in fat, salt and sugar (HFSS). Takeawa

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											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 welcome references to the role of unhealthy food advertising within Policy TC5 and how the food environment impacts children and young people	As a part of a wider package of local and system activity, the Essex Healthy Weight Strategy (2024 – 2034). ECC require paragraph 15.38 is amended to read: Food choices, preferences and habits are formed at an early age and children are known to be increasingly more vulnerable to obesity that adults. Whilst there is a range of reasons – poor diet quality and diversity at home, lack of exercise or sedentary lifestyles – the access to fast food takeaways is of concern.								ys and promotions in food stores and high street environment can also add to the number of calories consumed. This is significant in Castle Point where obesity levels are higher than the national average, with insight from the annual National Child Measurement Programme (NCMP) which monitors the

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																			Body Mass Index (BMI) of children in reception and year six. It is therefore necessary to ensure As a part of a wider package of local and system activity, ‡The Essex Healthy Weight Strategy (2024 – 2034), prioritises addressing factors that influence the food environment,... Therefor

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																			e, 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. With reference to the Castle Point and Rochford Health and Wellbeing Strategy (2025-2028) there is therefor

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																			e a clear basis for seeking ... The NPPF supports the restriction of hot food takeaways and fast food outlets around schools. Food choices, preferences and habits are formed at an early age and Children are known to be increasingly more vulnerable to obesity that adults. Whilst there is a range of

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																			reasons – poor diet quality and diversity at home, lack of exercise or sedentary lifestyle s – 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.

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0285-0001	Individual	Karen	Page		Yes	SP3	No	Dear Sir/Madam I do not support the castle point plan regulation 19 draft consultation. I do not consider the draft plan to be legally compliant. Reason : It fails to consider strategic alternatives like North West Thundersley. It has no credible 5 year housing land supply.	No	Justified, consistent with national policy	I do Not consider the draft plan to be sound Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for castle point. The site selection ignores green belt / grey belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a “ no green belt build policy”. The site selection is based on the “over development of brown field sites”. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. The 3316+ urban homes for Canvey is not resident led.	Proposed Modification: Add North west thunderously site.	Not Stated		No		Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure.	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																		considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0285-0002	Individual	Karen	Page		Yes	C4	No	Canvey west homes puts residents in the east at risk with emergency evacuations procedures.	No	Not Stated			Not Stated		No		The 3316+ urban homes for Canvey is not resident led. Canvey west homes puts residents in the	Needs of emergency services considered in the supporting Infrastructure	N

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																	east at risk with emergency evacuations procedures.	Delivery Plan (IDP).	
0286-0001	Individual	Brian	Percy		Yes	SP3	No	Dear Sir/Madam I do not support the castle point plan regulation 19 draft consultation. I do not consider the draft plan to be legally compliant. Reason : It fails to consider strategic alternatives like North West Thundersley. It has no credible 5 year housing land supply.	No	Justified, consistent with national policy	I do Not consider the draft plan to be sound Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for castle point. The site selection ignores green belt / grey belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a “ no green belt build policy”. The site selection is based on the “over development of brown field sites”. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. The 3316+ urban homes for Canvey is not resident led.	Proposed Modification: Add North west thunderously site.	Not Stated		No		Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guide lines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2.	<u>Y - Policy SD3(3)</u> 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for

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																	site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	<u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0286-	Individual	Brian	Percy		Yes	C4	No	Canvey west homes puts residents in the east at risk	No	Not Stated			Not		No		The 3316+ urban homes for Canvey	Needs of emergency	N

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0002								with emergency evacuations procedures.					Stated				is not resident led. Canvey west homes puts residents in the east at risk with emergency evacuations procedures.	services considered in the supporting Infrastructure Delivery Plan (IDP).	
0287-0001	Individual	Gary	West		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led. The inclusion	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No	A	Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure.	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u>	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council'

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											of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.								Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered	s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		through the SFRA.	
0287-0002	Individual	Gary	West		Yes	C4	No	, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	No	Not Stated			No		No	A	The 3316+ urban homes for Canvey is not resident led. Canvey west homes puts residents in the east at risk with emergency evacuations procedures. Objects to allowing mixed use on Charfleets. Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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																		that there is no reasonable prospect for the site to be used for these purposes'	
028 2-003 1	Organisation	Kevin	Fraser	Essex County Council	Yes	TC5	Not Stated		Yes		ECC supports the approach to manage hot food takeaways and fast-food outlets in the borough, in accordance with Paragraph 97 of the NPPF (December 2024). This paragraph recognises the role of planning in shaping the local food environment and explicitly states that: "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" Evidence shows that: • Hot food takeaways tend to serve food higher in calories than meals prepared at home. • Their numbers are increasing, particularly in areas of deprivation. • These outlets are often concentrated in		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Reference should be made to the National Child Measurement Programme (NCMP) to provide additional detail around local obesity Supports this policy and the management of hot food takeaways and fast-food outlets in the borough to include restaurants which offer takeaway services. Reference the Castle Point and Rochford Health and Wellbeing Strategy (2022-2027) which makes reference to hot food takeaways and poor health ECC welcomes reference to the Essex Healthy Weight Strategy within policy TC5 ECC welcomes the reference to the role that unhealthy food advertising plays within Policy	Accepted and additional text added referencing National Obesity Strategy's evidence Noted and agreed. No modification. Accepted however the document is Rochford and Castlepoint Health and Wellbeing Strategy updated February 2025. Strategy 2025-2028 Accepted and reference added to Essex Health Weight Strategy Accepted and additional text added	

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											communities with higher levels of obesity. • There is growing public concern of the intense promotion of unhealthy food in some places and, especially its impact on children and young people 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. 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 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,								TC5 and request some additional information added.		

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											and the Planning Practice Guidance (PPG) has not been updated to provide clarity on this definition.								
0289-0001	Individual	Jacqui	Thornton		Yes	SP3	No	Dear Sir/Madam, I cannot support the Castle Point Plan Regulation 19 Draft Consultation in its current form. I do not consider the draft plan to be legally compliant for the following reasons: It has not been positively prepared. The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seeks to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable	No	Consistent with National Policy	The Plan is not consistent with national policy in promoting sustainable development as the NPPF requires consideration of the combined impact of developments on air quality at a local level. The plan proposes overdevelopment of urban areas and evidence documents accompanying the plan state this will result in poorer air quality for future inhabitants than the alternative of a more spacial approach. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at a Sheltered Unit in Hadleigh as a site identified as suitable to support windfall development. This is not the case. The car park is already used to capacity to support the residents of	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seeks to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot	<u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Air Quality</u> Air quality impacts are assessed in the Sustainability Appraisal, including under objective 9.1. Annual Status Reports for Castle Point can be found on the Essex Air website along with further information relating to air quality within Castle Point.	N

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								five year housing supply consistent with national policy. This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission.			the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents of the complex who would be impacted have not been sufficiently consulted on this allocation during the draft plan being prepared. The evidence document identifying it on the map, the Castle Point Housing Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. When questioned, Officers claimed the identification of Windfall Allowance sites was calculated using AI with no in person follow up was conducted to assess them, and consequently many of the sites may prove unsuitable. This leaves the calculation of the windfall allowance and its contribution to the housing total provided by the Plan flawed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy						demonstrate a sustainable five year housing supply consistent with national policy. This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission. The Plan is not consistent with national policy in promoting sustainable development as the NPPF requires consideration of the combined impact of developments on air quality at a local level. The plan proposes overdevelopment of urban areas and evidence documents accompanying the plan state this will result in poorer air quality for future inhabitants than the alternative of a more spacial approach.	monitor nitrogen dioxide using diffusion tubes at 30 monitoring locations around the district. The main source of pollution in the Borough is road traffic emissions from major roads, notably the A13, A127 and A130. The Council has not declared any Air Quality Management Areas (AQMAs). Generally, air pollution is low in Castle Point. Results from the monitoring points across the Borough suggest that air quality is improving. <u>Windfall Allowance</u> The Windfall allowance map included within the topic paper is an indicative map of potential windfall sites and are not allocated sites. The Windfall allowance has been calculated	

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											because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The council has also failed to consider the alternative possibility of affording the GB6 wider protection by designating it as Local Green Space. This could be possible due to the tightly woven network of bridleways, natural footpaths and wildlife sites that already offer green space, recreation and access to natural habitat for existing residents. This offers potential for residents and local wildlife and conservation organisations to draw funding for nature recovery and enhance the area's biodiversity and protect both the wildlife and integrity of the area. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Council						In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at a Sheltered Unit in Hadleigh as a site identified as suitable to support windfall development. This is not the case. The car park is already used to capacity to support the residents of the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents of the complex who would be impacted have not been sufficiently consulted on this allocation during the draft plan being prepared. The evidence		in accordance with historical trends. <u>GB6 and Grey Belt</u> It should be noted that GB6 has not been allocated for development in the Local Plan, Multiple environmental constraints on GB6 were identified in the Sustainability Appraisal, including multiple separate Tree Protection Orders, collectively covering approximately half the site and potentially severely limiting developability, ancient woodland on site - north east section does not appear developable for this reason, approximately 2/3 of site covered by Priority Habitats (Protected under 2006 NERC Act):	

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											Members have predetermined their stance on the Plan to fulfil an election pledge not to build on any Green Belt, failing to keep an open mind when considering evidence produced during the consultation period and have compromised the consultation by publicly informing residents that a failure to support the plan 'as is' will automatically result in all green belt being lost. Members and the council have failed to engage constructively with resident groups and residents who expressed concerns over the plan. Instead of listening to those concerns and responding with reasonable consideration, some Members have publicly insulted residents who questioned their approach. It is crucial that the alternative of NW Thundersley is rigorously pursued and obstacles challenged robustly in order that we can adhere to the Government policy in meeting their targets and not unnecessarily put the remaining strategic Green Belt Sites at risk through modifications by the inspector or intervention.						document identifying it on the map, the Castle Point Housing Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. When questioned, Officers claimed the identification of Windfall Allowance sites was calculated using AI with no in person follow up was conducted to assess them, and consequently many of the sites may prove unsuitable. This leaves the calculation of the windfall allowance and its contribution to the housing total provided by the Plan flawed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site	Deciduous woodland and mixed habitats - difficult to develop without significant harm. <u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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																	within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The council has also failed to consider the alternative possibility of affording the GB6 wider protection by designating it as Local Green Space. This could be possible due to the tightly woven network of bridleways, natural footpaths and wildlife sites that already offer green space, recreation and access to natural habitat for existing residents. This offers potential for residents and local wildlife and conservation organisations to draw funding for		

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																	nature recovery and enhance the area's biodiversity and protect both the wildlife and integrity of the area. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Council Members have predetermined their stance on the Plan to fulfil an election pledge not to build on any Green Belt, failing to keep an open mind when considering evidence produced during the consultation period and have compromised the consultation by publicly informing residents that a failure to support the plan 'as is' will automatically result in all green belt being lost.		

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																	Members and the council have failed to engage constructively with resident groups and residents who expressed concerns over the plan. Instead of listening to those concerns and responding with reasonable consideration, some Members have publicly insulted residents who questioned their approach. It is crucial that the alternative of NW Thundersley is rigorously pursued and obstacles challenged robustly in order that we can adhere to the Government policy in meeting their targets and not unnecessarily put the remaining strategic Green Belt Sites at risk through modifications by the inspector or intervention.		

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0290-0001	Individual	DJ	Traer		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Failed to consider strategic alternatives like North West Thundersley No credible five-year housing land supply. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Infrastructure</u> Infrastructure	<u>Y - Policy SD3(3)</u> 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.							matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>SUDs</u> Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Strategic Flood Risk Assessment (SFRA).
0290-0002	Individual	DJ	Traer		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0291-0001	Individual	IA	Traer		Yes	SP3	No	Dear Sir/Madam, I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Doesn't meet the housing target for Castle Point, Fails to consider strategic alternatives like North West Thundersley. No credible 5 year housing land supply. The site selection ignores green belt / grey belt against new NPPF guidelines. Not all sites have been considered. No green Belt/Grey Belt sites added, specifically with the exclusion on North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable drainage measures are not appropriate for Canvey Islands unique geography and drainage infrastructure. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500	<u>North-West Thundersley</u> North west Thundersley was considered but not preferred for reasons set out in the SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2. <u>Reasonable Options</u> All reasonable option sites	<u>Y - Policy SD3(3)</u> 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	considered in SLAA and SA. <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA). <u>Flooding</u> and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Charfleets:</u> Charfleets Industrial Estate is included within Policy E1 which includes	Strategic Flood Risk Assessment (SFRA).

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																		the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	
029 1-000 2	Individual	IA	Traer		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
029 2-000 1	Individual	Jeffrey	Osborn		Yes	Whole Plan	Yes	Dear sir/madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
029 3-000 1	Individual	Jan	Galgey		Yes	Whole Plan	Yes	Dear sir/madam I support the castle point plan regulation 19 draft consultation I consider the draft plan to be legally compliant I consider the draft plan to be sound	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N

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0294-0001	Individual	Andrew	Thornton		Yes	SP3	No	Dear Sir/Madam, Please find below my Reg 19 Consultation submission to the Castle Point Plan. Please acknowledge receipt. I cannot support the Castle Point Plan Regulation 19 Draft Consultation. I do not consider the draft plan to be legally compliant as it has not been positively prepared and is not justified due to not being compliant with national policy. The plan does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seek to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy.	No	Consistent with National Policy	This consequently puts the strategic green belt it seeks to protect at greater risk of speculative development by providing a presumption in favour of development and the exceptional circumstances that justify permission. GB6 GB6 as a Strategic Green Belt site has been extended from H10 in the previous withdrawn plan to make it compliant with the councils policy that Strategic GB sites should accommodate over 100 dwellings. This includes land, including my own, that was not submitted in the CFS, nor do I consent to it being developed. By identifying the entirety of GB6 as Grey Belt land in evidence documents, there exists a conflict with National Policy because the council fails to acknowledge the existence of the Local Wildlife Site within the boundary of GB6. Local Area Wildlife Sites are designated for their high ecological value and habitats, making them important areas for nature conservation and NPPF includes protections for them and they are included in Footnote 7 of the NPPF. The area also consists of a large area of residential gardens (curtilage of existing dwellings), that are close and connected to the	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	<u>Housing Supply</u> Does not have a clear strategy that meets the assessed needs of the area that is consistent with the latest update to national policy effective December 2024, nor was the Plans Reg 19 Consultation implemented within the timeframe to benefit from transitional arrangements it seek to utilise. The Plan fails to use the mandatory Standard Methodology to calculate its housing need, as defined in the updated NPPF, and cannot demonstrate a sustainable five year housing supply consistent with national policy. <u>GB6</u> This includes land, including my own, that was not submitted in the CFS, nor do I consent to it being developed. It also includes residential gardens Argues it	<u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. Standard method achievability also considered in the SA. <u>GB6</u> This site is not allocated for development. But it is noted that owner aspirations and sites not having been submitted is a further constraint on the realism of the overall housing target. Ecological constraints were identified in the SA/SEA and SLAa <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for	N

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											residential urban area enough that they should be afforded the exemptions identified from classification as PDL, as defined in the NPPF. The area includes equestrian grazing land that should also be afforded the exemptions identified from classification as PDL, as defined in the NPPF. In combination, these remove a substantially significant area of land that impacts the viability of GB6 as a viable strategic Green Belt site, and also redefines the possibility of Grey Belt designation. The plan, whilst it's objective seeks to protect strategic Green Belt sites from development, fails to consider the alternative of designating GB6 as a Local Green Space. This would not necessarily open land to the public that is in private ownership, as the designation itself does not mandate public access beyond what currently exists but offers protection for the site's special local significance, beauty, wildlife, and recreational value. The network of bridleways, footpaths and country lanes that cover the sites are well used by the community for recreational purposes and are well used and valued by residents.						meets Green Belt criteria by virtue of beauty, historic significance, recreational value, richness of wildlife. Alleges GB6 falls with Local Wildlife Site <u>PROPOSED MODIFICATIONS:</u> Add North West Thundersley site Reduce densities in the Urban Town Centres Apply flooding and COMAH constraints to reduce allocation on Canvey Green Space Designation for GB6 Removal of Westwood Court Car Park from windfall allocation	allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Canvey</u> Constraints have been considered.	

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											GB6 meets the ‘particular circumstances’ that qualify a piece of land for Local Green Space Designation protection as it is close to the community it serves and is demonstrably special to the local community. It fulfils the criteria required as listed below: (a) Beauty the network of bridleways, footpaths and county lanes covering GB6 demonstrate visual attractiveness, and it contributes to landscape, character and setting of the area. It contributes to local identity and character of the area and offers a sense of place, making an important contribution to the physical form and layout of its surroundings. It also links up with Coombe Wood and Thundersley Glen which allows views beyond GB6 which are valued locally. (b) Historic significance The land forms part of the historic plot-lands linked to Jarvis Hall and still contains evidence of original dwellings from over a century ago. The land provides a setting for, and allow views of these buildings and the council has already identified some as potential local heritage assets. (c) Recreational value The land supports a variety of activities									

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											including horse riding, walking and cycling and is of local significance for recreation and is valued by the community. (d) Tranquility GB6 provides an area of quiet tranquility that provides an oasis of calm and a space for quiet reflection. This benefits the well being of residents and aids positive mental health outcomes. (e) Richness of wildlife GB6 contains a valued habitat and is rich with wildlife, including protected species and hosts large areas of trees, hedges and plant life that help support them as well as having a Local Wildlife site within its boundary. Development restrictions on land designated as Local Green Space are strong, similar to the Green Belt, and new development is only permitted in exceptional circumstances. This designation would add remaining protection to the site even if, ultimately, its Green Belt status is removed through the Plan. Local residents and environmental groups are willing to be involved in working with the council to make this a reality, and a modification to include Local Green Space designation for GB6 should be added to the plan.								

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029 5-000 1	Individual	Dean	Buckingham		Not Stated	Whole Plan	Yes	I believe the draught plan has been legally prepared and is sound	Yes				Not Stated		No		Castle Point Plan is sound and legally compliant,	Support Noted	N
029 6-000 1	Individual	Ray	Galgay		Yes	Whole Plan	Yes	I support the Castle Point Plan Regulation 19 Draft Consultation. I consider the draft plan to be legally compliant. I consider the draft plan to be sound.	Yes				Not Stated		No	A	Castle Point Plan is sound and legally compliant,	Support Noted	N
029 7-000 1	Duplicate representation received. See representation 1056-0001.																		
029 8-000 1	Individual	Alan	Tibbit		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No	A	Not all sites have been considered. No Greenbelt / Grey Belt sites added. Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and

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											development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						Site selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0298-0002	Individual	Alan	Tibbit		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No	A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0299-0001	Individual	Carol	Crawley		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Not all sites have been considered. No Greenbelt / Grey Belt sites added. Fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape charact

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											guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						guidelines. Site selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to	er and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0299-0002	Individual	Carol	Crawley		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0300-0001	Individual	Rebecca	Harris		Yes	SP3	No	Dear Castle Point Borough Council, Please accept the following as my response to the Regulation 19 consultation on the Castle Point Draft New Local Plan. As the Member of Parliament for Castle Point, I have always stood firmly alongside local residents in defending the character, integrity, and resilience of our Borough. The Regulation 19 consultation represents a vital opportunity to shape a Local Plan that reflects not only the needs of our communities but also their values and aspirations. Castle Point is a unique and tightly constrained area. We are blessed with beautiful open spaces, a rich natural environment, and a strong sense of local identity. But we also face serious challenges, particularly around flood risk, infrastructure capacity, and the pressure to accommodate growth. These issues are especially acute on Canvey Island, where the risks of tidal and surface water flooding are well known, and in parts of Benfleet and Hadleigh, where drainage infrastructure is under strain. Also, significantly there are effectively only three highways access routes in and out of the	No	Positive,Effective,Justified,Consistent	Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable Urban Drainage Systems (SUDS) necessary to not upset the balance of the island's already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS' measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island's unique geography and drainage infrastructure. The island's low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater	Conclusion and Recommendation to Modify the Plan The Castle Point Plan is a defining document for our Borough. The Council should be commended for prioritising brownfield sites and engaging positively with residents throughout the Regulation 19 process. However, I believe the Plan requires significant revision to meet the tests of soundness. Castle Point has significant infrastructure vulnerabilities, particularly in Canvey Island. The allocation of over 3,300 homes on the island must be reconsidered. The Plan falls short in demonstrating a deliverable five-year housing land supply. Strengthening the brownfield strategy and including North West Thundersley would improve resilience and deliverability. Essex County Council is investing in infrastructure and would be legally obliged to cooperate. North West Thundersley offers a strategic opportunity for sustainable growth. I also encourage the Council to release a more accessible version of the consultation. Many residents have found the Regulation 19 process difficult to engage with due to its length and complexity. A more user-friendly approach would help ensure that all voices are heard. I	Not Stated		No		<u>Green Belt</u> Welcomes the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. <u>North West Thundersley</u> That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a	Recognition of strong community engagement noted. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								Borough for all its almost 100K residents, Sadlers Farm, the A13 towards Southend, or Rayleigh Weir. I welcome the Council's decision not to include any of the Green Belt sites that are so treasured by local residents in the first draft of this plan. This is a victory for residents and a testament to the strength of community feeling. Our Green Belt is not just a planning designation, many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, for reasons I will detail later in this response, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. That said, I do believe there is a case for a carefully considered exception in the site known as North West Thundersley, or colloquially as the expanded 'Blinking Owl Site'. This site offers a rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan			contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere without regard to the local constraints. In summary, the Plan must be revised to provide a more robust justification for its housing shortfall, reassess the exclusion of North West Thundersley, strengthen delivery mechanisms, and align more closely with national policy. Site allocations for strategic housing growth – Concerns and Alternatives The spatial strategy proposed in the Plan places disproportionate pressure on Canvey Island, despite its well-documented flood	urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.					rare opportunity to deliver much-needed housing in a sustainable and accessible location, without undermining the wider function of the Green Belt. It is a pragmatic solution to a difficult problem, and I support its inclusion in the Plan as a way to increase the soundness of the plan whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing	<u>Housing Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Biodiversity</u> Policies ENV1 to ENV6 set out the Council's approach to protect existing assets, and mitigate impacts including via Biodiversity Net Gain, LNRS and design features. The protection biodiversity features is reinforced via consideration these factors in relation to site options in the SA and SLAA; and also the mitigation of impacts upon international sites via the HRA process.	

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								whilst allowing for the better protection of other more accessible Green Belt sites residents treasure, a significant decrease in planned housing density on Canvey Island, and creating an extra highway access for the Borough onto the wider road network. I would also like it to be acknowledged that, although the Council’s approach to engagement has been broadly constructive and the consultations on the Plan well-advertised, many residents have found the Regulation 19 consultation difficult to engage with due to its length and complexity. It is vital that, where possible, this is made more accessible for residents, so that all voices in our community can be heard and understood. Hence why, although I have attempted to answer all the questions in the consultation, I would like this document treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this format than it is by engaging with the formal consultation questionnaire online. The key points I wish to raise in this response regarding the draft plan are: * Castle Point faces serious			risk and infrastructure limitations. The allocation of over 3,300 homes is excessive and difficult to justify. North West Thundersley offers a far more suitable location for strategic growth. It benefits from superior transport connectivity, greatly lower flood risk, and strong public support. The site is composed largely of plotlands and industrial units, and its development would affect fewer residents. Its exclusion is not adequately justified in the Council’s evidence base. The Sustainability Appraisal fails to assess North West Thundersley as a reasonable alternative. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. A revised spatial strategy should reduce the housing burden on Canvey Island and incorporate North West Thundersley. Canvey Island’s geography and infrastructure present significant planning challenges, particularly related to flood risk. I welcome the Council’s commitment to requiring Sustainable Urban Drainage Systems (SUDS) in all new developments. However, SUDS must be designed with a full understanding of Canvey’s unique drainage							numbers on Canvey Island. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. NW Thundersley not adequately assessed in the SA. <u>Duty to Cooperate:</u> Fails legal duty. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. <u>Five Year Housing Supply</u> The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. <u>Biodiversity</u> The Plan’s approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes		

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								challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. * The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects strong community engagement. * North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. * The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas			context. The slow release of retained water can have negative cumulative effects if not properly accounted for. The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the ‘Canvey Third Access Task Force’ in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. North West Thundersley offers a more suitable alternative, with better connectivity, lower flood risk, and infrastructure-led potential. Five-year Housing Supply and Green Belt Protection Castle Point Borough Council deserves credit for adopting a brownfield-first approach. This aligns with national policy and reflects local priorities. However, the Plan must demonstrate that brownfield opportunities are						clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical.		

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								where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. A key statutory requirement is the ‘Duty to Cooperate’. This is not a procedural formality but a legal obligation requiring sustained and meaningful engagement with neighbouring authorities and statutory bodies on strategic matters. Paragraph 28 of the NPPF is explicit in its expectation that Statements of Common Ground should be used to evidence this cooperation. In Castle Point’s case, the absence of clear and binding agreements on cross-boundary infrastructure and housing distribution is a serious concern. Without demonstrable cooperation, the Plan risks being found unsound on procedural grounds alone. The Sustainability Appraisal, which underpins the Plan’s spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Yet the strategic alternative of North West Thundersley, an option that could deliver sustainable			deliverable and capable of contributing meaningfully to housing supply. The failure to demonstrate a deliverable five-year housing land supply within this plan, as mandated by the NPPF, is a serious concern. Without it, the Borough remains exposed to speculative development on all Green Belt land where development is possibly viable. This is, I believe, a fatal flaw in the Plan as it stands and needs addressing immediately. Having a five-year supply of housing to meet local need is crucial to the soundness of the plan, but it is also a very robust defence against speculative planning applications, something that the local Green Belt site’s residents desperately need the protection of in the face of ever-growing numbers of speculative planning applications and appeals. Green Belt land provides flood attenuation, biodiversity, and recreational value. Its protection is essential. I commend the Council for removing several treasured Green Belt sites from consideration for development. However, I fear that gesture made on behalf of concerned residents will be rendered meaningless, providing								

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								growth in a well-connected location, has not been adequately assessed. The Plan's approach to biodiversity and environmental protection also requires strengthening. Paragraph 180 of the NPPF makes clear that development should not proceed where it would result in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. While the draft Plan identifies a range of mitigation measures, it does not yet provide enforceable delivery mechanisms. Without clear implementation pathways, these measures risk remaining theoretical rather than practical. Perhaps most critically, the Council has not yet demonstrated a deliverable five-year housing land supply, as required under paragraph 78 of the NPPF. This is not a technical detail; it is a fundamental test of the Plan's credibility. Policy SP3 in the Plan does not provide a deliverable five-year supply of housing land for either the Government's housing targets, or indeed the Council's own lower assessed need. The absence of a transparent and evidenced supply not only weakens the Plan's position but also leaves all			little or no actual defence of those Green Belt sites that residents want to see preserved if the Council does not include a viable five-year supply of deliverable housing into the plan and better evidence its case for a lower housing target. I am concerned that either the Planning Inspector is likely to direct the Council to include a quantum of deliverable Green Belt sites to meet the need, which is likely to see a greater rush of speculative planning applications on Green Belt while the Council decides which ones to include, or the Secretary of State may decide to take plan-making powers away from Castle Point Borough Councillors entirely. Although most local Green Belt sites should be protected from development in the plan, North West Thundersley represents a carefully considered exception. It offers infrastructure-led growth in a sustainable location and would relieve pressure on more vulnerable areas. As a new settlement, it could be built to different style specifications to the rest of the Borough (e.g. three- or four-story town houses) that would allow for gentle densification compared to										

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								of Castle Point’s Green Belt, which possibly could be developed, critically vulnerable to speculative development, particularly areas that are environmentally sensitive or poorly served by infrastructure. In summary, while the Regulation 19 draft represents progress, in my view, the draft plan is not yet legally compliant. The Plan must be revised to address these shortcomings, particularly in relation to the Duty to Cooperate, the treatment of strategic alternatives, the enforceability of mitigation, and the evidencing of housing supply. These are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination, the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain			other residential settlements in the Borough. Recommendation to include North West Thundersley in the plan as a strategic housing growth site The exclusion of North West Thundersley from the Castle Point Plan is not only a strategic oversight, it is a missed opportunity to deliver sustainable, infrastructure-led growth in a location that is demonstrably more suitable than many of the sites currently proposed. The area, particularly the Blinking Owl site, has long been recognised in previous capacity studies as capable of accommodating up to and over 5,000 homes. This scale of development would not only relieve pressure on Canvey Island but also contribute meaningfully to closing the gap between Castle Point’s current housing trajectory and the Government Assessed Need. The current Plan places disproportionate reliance on Canvey Island, despite its well-documented flood risks and infrastructure constraints. By contrast, as previously discussed, North West Thundersley offers a strategic growth location with lower flood risk, stronger transport connectivity, and greater								

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								concerned that the Plan does not yet meet these essential criteria in full. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it cannot meet the Government’s target and needs to show it has considered every viable alternative. I think significant work is still required from the Council to meet both these vital requirements, to successfully secure the acceptance of a significantly lower housing figure than the proposed target. The Plan proposes to deliver only around 53% of the Government’s housing target, representing a shortfall of approximately 5,446 homes over the 17-year plan period. This gap has not been robustly justified.			public support. It is situated on higher ground, adjacent to the A127 corridor. These characteristics align with the principles set out in paragraphs 8, 11, and 20 of the NPPF (2024), which require that development be directed to locations that are sustainable, resilient and capable of supporting necessary infrastructure. Claims that the North West Thundersley site is not viable due to policy restrictions by the local highways authority are unjustified in the plan and do not withstand scrutiny. Essex County Council is currently investing over £59 million in the Fairglen Interchange upgrade, in partnership with the Department for Transport and the South East Local Enterprise Partnership. This scheme includes new slip roads, signalised junctions, and pedestrian/cycle infrastructure, all designed to accommodate future housing and economic growth in South Essex. Additionally, Essex County Council’s own infrastructure planning documents acknowledge that the A127/A130 corridor will come under increasing pressure due to planned growth, and that long-term options for further expansion remain viable.								

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								Although to many residents and observers it is obvious that our area cannot meet the Government's impossibly high housing target, the strongest possible evidence must be presented to explain and prove exactly why. Environmental constraints and infrastructure limitations are cited, but national policy requires that such constraints be clearly evidenced and that all reasonable alternatives be fully explored. It is absolutely imperative that this is addressed for the plan in its current form to be found sound. The exclusion of North West Thundersley undermines the claim that the Plan has been positively prepared. The Sustainability Appraisal fails to assess North West Thundersley in any meaningful depth. The analysis is superficial and lacks the comparative rigour applied to other locations. This omission risks rendering the Plan unsound under paragraph 35(b) of the NPPF. The five-year housing land supply is not convincingly demonstrated, and reliance on constrained sites casts doubt on deliverability.			subject to funding and strategic coordination. There is no formal policy from Essex County Council opposing new junctions in principle. On the contrary, their planning approach is growth-responsive and designed to support development where it is justified and properly planned. It is also important to clarify that, under the Duty to Cooperate provisions of the Planning and Compulsory Purchase Act 2004, and as reinforced by paragraphs 24–28 of the NPPF, Essex County Council would be legally obliged to engage with Castle Point Borough Council if North West Thundersley were included in the Plan. Their role would be to assess feasibility, cost and mitigation – not to veto strategic growth proposals. The Planning Inspectorate has consistently advised that infrastructure constraints must be addressed through joint working and evidence-based planning, not through informal objections. Furthermore, while a portion of the site lies within the Green Belt designation, its inclusion can be justified under paragraph 143 of the NPPF, which allows for Green Belt release where exceptional								

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											circumstances are demonstrated. In this case, the circumstances are clear: Castle Point faces a significant housing shortfall, and North West Thundersley offers a location where growth can be delivered safely, sustainably, and with minimal environmental impact. The site is composed largely of ‘Grey Belt’ plotlands, light industrial units, and inaccessible land, and its development would affect fewer existing residents than other Green Belt sites. It is precisely the kind of strategic release that the NPPF envisages - one that protects more sensitive areas by concentrating growth where it can be properly supported. In summary, the Plan should be modified to include North West Thundersley as a strategic growth location. This would not only improve the Plan’s soundness under paragraph 35, but also reflect a more balanced, evidence-led, and community-supported approach to development across Castle Point. It is a solution that meets the tests of sustainability, deliverability, and public interest — and one that should be embraced, not dismissed. With the right								

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											adjustments, this Plan can secure a future for our local area that is sustainable and in the best interests of current and future residents of our Borough. Kind regards, Rebecca Dame Rebecca Harris MP Member of Parliament for Castle Point								

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0300-0002	Individual	Rebecca	Harris		Yes	SP3	No				West of Canvey Road (GB1) The Council claim the parcel lies adjacent to the urban edge and therefore makes a weaker contribution to openness¹. West of Canvey Road is essential to the integrity of Canvey Island's landscape. Far from being derelict, it provides a critical buffer between residential areas and hazardous COMAH-designated industrial sites. The land also performs a floodplain function in a borough where surface water and tidal flooding are already major concerns. Its open aspect gives relief from urban intensity and provides resilience against climate challenges. Reclassifying such a strategically important piece of land as Grey Belt is wholly inappropriate and contrary to the NPPF's requirement to safeguard land from encroachment². 1 = Housing Capacity Topic Paper (August 2025), pp.39-46. Table 13.10: list of Grey Belt parcels and commentary. "Land adjacent to settlement edge with reduced openness..." (p.40). "Fragmented ownership reduces contribution to Green Belt purposes."		Not Stated		No		<u>Canvey Allocation</u> The proposed allocation of over 3,300 homes to Canvey Island is excessive given its environmental and infrastructure constraints. The housing allocation to Canvey Island should be reduced and made contingent upon robust flood resilience measures, including a comprehensive drainage strategy unique to Canvey Island and renewed exploration of a third access route. <u>Flood Risk and SuDs, particularly on Canvey</u> Paragraphs 159 and 161 of the NPPF are clear that development should be directed away from areas at highest risk of flooding. The current strategy does not reflect this principle even though flood risk on Canvey is subject to very effective mitigation, the unique adaptations to Sustainable	<u>Canvey</u> All reasonable option sites, including on Canvey and elsewhere, were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Canvey Access</u>	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											(p.41). “Equestrian land considered less open.” (p.44). 2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances.						Urban Drainage Systems (SUDS) necessary to not upset the balance of the island’s already complex drainage network are not sufficiently taken into account in the Plan. Many of the SUDS’ measures routinely deployed on housing sites elsewhere in the country are simply not appropriate for Canvey Island’s unique geography and drainage infrastructure. The island’s low elevation, high groundwater levels, tidal influence and reliance on pumped discharge mean that infiltration-based systems such as soakaways, infiltration trenches, permeable paving that depends on infiltration, and unlined attenuation basins would be ineffective at best – and dangerous at worst. These systems rely on water soaking naturally into the	The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan	Strategic Flood Risk Assessment (SFRA).

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																	ground, yet Canvey's ground conditions make this highly unlikely and risk creating new flooding or groundwater contamination problems. Similarly, swales designed primarily as infiltration features would not function as intended and could fail under high tide or storm conditions. Any on-site drainage solutions that cannot be mechanically discharged or connected into a properly managed and maintained system would pose an unacceptable risk. The Council's plan must reflect this reality and ensure that all new developments on Canvey use only those SUDS types that are compatible with its tidal regime, high groundwater, and pumped network, not shoehorn in the same infiltration-based measures used elsewhere		

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																	without regard to the local constraints <u>Canvey Access Issues</u> The lack of a third access point to Canvey because of its unique geography remains a strategic weakness. It is deeply regrettable that the Council abandoned work on the 'Canvey Third Access Task Force' in 2022. Had this work continued, a viable solution could have been identified and included within the Plan period.		
0300-0003	Individual	Rebecca	Harris		Yes	SP3	Not Stated		No	Not stated	East of Canvey Road (GB3) The Council's justification for classing it as 'Grey Belt' land seems to be is that it is adjacent to existing built area was and previously considered for development, therefore seen as lower value ¹ . This parcel is wrongly characterised. East of Canvey Road provides separation between industrial uses and residential communities. Its open nature prevents ribbon development along this strategic road and offers necessary land for		Not Stated		No		Objects to categorisation of GB3 as Grey belt	Noted.	N

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											drainage and flood resilience. Canvey is already over-allocated with housing in this draft plan, to designate such land as Grey Belt ignores the island's unique vulnerability and the strong evidence from Essex County Council's Section 19 Flood Report³. 1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44). 3 = Section 19 Flood Investigation Report – Castle Point (Essex County Council, 2022) “Surface water flooding across Canvey Island demonstrates the severe limitations of drainage infrastructure.” (p.12). “Increased impermeable surfaces will exacerbate flood risk.” (p.23)."								

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0300-0004	Individual	Rebecca	Harris		Yes	SP3	No		No	Not stated	Land South of Charfleets (GB3) The Council’s justification for classing it as ‘Grey Belt’ land seems to be the proximity to Charfleets industrial estate and perception of reduced “connectivity” ¹ . Land South of Charfleets forms a vital open break preventing sprawl from overwhelming this industrial area. Its greenery offsets industrial activity, provides amenity value and performs drainage functions. To downgrade it because of industrial adjacency is to misunderstand Green Belt policy, the NPPF explicitly highlights safeguarding the countryside from encroachment as a key purpose ² . A better and more balanced alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough’s most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong and dishonest to not classify all or if not significantly more of the site as ‘Grey Belt’ when it features far more derelict, underused and		Not Stated		No			Objects to categorisation of GB27, GB31 and GB34 as Grey belt	Noted.	N

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											plotland sites that provide little or no amenity to local residents. 1 = Housing Capacity Topic Paper (August 2025), pp.39–46. Table 13.10: list of Grey Belt parcels and commentary. “Land adjacent to settlement edge with reduced openness...” (p.40). “Fragmented ownership reduces contribution to Green Belt purposes.” (p.41). “Equestrian land considered less open.” (p.44). 2 = National Planning Policy Framework (Dec 2024) Para 138: Green Belt serves five purposes including preventing sprawl and safeguarding countryside. Para 143: Green Belt boundaries should only be altered in exceptional circumstances. Para 147: Inappropriate development is harmful and should not be approved except in very special circumstances. West of Benfleet (Jotmans) (GB5) The Council’s justification for classing it as ‘Grey Belt’ land seems to be based on somewhat fragmented ownership of the whole site (although large parts are in single ownership) and adjacency to existing								

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											residential development¹. The Jotmans fields are one of the most important open landscapes in Castle Point. They prevent coalescence between Benfleet and surrounding areas, retain visual openness and support biodiversity corridors. Fragmented ownership does not diminish value, indeed it may reduce development pressure. Residents have repeatedly resisted speculative schemes here, demonstrating it's continued community importance. Just as with Glebelands, I stood shoulder to shoulder with residents to fight previous attempts to develop part of this site at planning appeal stage and then the High Court. I am disappointed that those victories could be rendered meaningless by now designating it 'Grey Belt'. Land between Felstead Road and Catherine Road (GB6) The Council's justification for classing it as 'Grey Belt' land seems to be that its irregular shape and limited access diminish its strategic contribution¹. Shape and access are not tests of Green Belt worth. This parcel prevents outward sprawl from nearby									

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											roads and maintains openness in a heavily developed part of the Borough. It also supports biodiversity and drainage in an area prone to surface water flooding. To mark it as Grey Belt is to ignore its real-world function. The Chase (GB12) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is adjacent to residential development and the fact that has been assessed as having a lower contribution to the functions of Green Belt in SLAA¹. The Chase is an important open space separating built form and providing amenity value. It preserves the pattern of settlement and is highly visible to local residents. To release this parcel would set a precedent for creeping infill that undermines the wider Green Belt. East of Rayleigh Road (GB13) he Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is on the edge of the current settlement boundary and, previously promoted for development¹. This land provides the rural setting of Rayleigh Road,								

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											preventing the blurring of urban boundaries. It supports biodiversity and acts as an accessible green corridor. Past promotion for development does not negate its current Green Belt functions. I stood with residents and the Council to fight against and win an appeal to prevent development on this site only last year. That victory should not be rendered meaningless by it being classified as ‘Grey Belt’ now. North of Grasmere Road (GB15) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is a promoted site in SLAA and that is adjacent to and area of high housing noted¹. These open fields prevent sprawl and retain a strong settlement boundary. They also provide informal recreation for nearby residents and support biodiversity. To call this Grey Belt is to undervalue the clear openness and function it provides.								

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											East of Manor Trading Estate (NR3) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that the adjacent trading estate diminishes openness¹. This parcel is a buffer between employment and housing, mitigating noise and pollution. It safeguards residents’ quality of life while preventing encroachment. Its role as a barrier to industrial creep is precisely the kind of function the Green Belt is meant to serve. Land North of Thundersley Church Road & East of Downer Road North (GB19) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is on the edge of the current settlement and land promoted through the call for sites¹. This land forms a distinct wedge of open countryside that prevents coalescence, supports biodiversity and									

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											protects Thundersley's semi-rural setting. Its importance is recognised by residents who have fought repeated attempts to develop it. Land to the rear of 329 Benfleet Road (GB23) The Council's justification for classing it as 'Grey Belt' land seems to that it is a small parcel promoted in call for sites¹. Small parcels often have high value. This one prevents ribbon development and protects neighbour amenity. It should not be downgraded merely for its size. Land off Shipwrights Close (GB24) The Council's justification for classing it as 'Grey Belt' land seems to be that it is a 'gap' site adjacent to housing¹. This parcel prevents settlement creep and maintains green relief for residents. Loss would encourage incremental erosion of the Green Belt.								

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											Land between Glen Haven and Ye Oaks, Bassenthwaite Road (GB26) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is on the edge of a plot promoted for development¹. This site maintains the clear transition from settlement to countryside. Its openness is important locally. Downgrading it risks creeping coalescence. Land Adjacent 298 Church Road (GB27) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it was identified as a small parcel available for development in call for sites¹. This land contributes to the green setting of Church Road. Small parcels can be disproportionately important to character.										

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											Land off Glyders (GB31) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that it is an edge-of-settlement parcel¹. Glyders prevents sprawl and supports biodiversity. Its downgrade is unjustified. I also believe this was also not a site featured in the regulation 18 consultation as a possible Green Belt development site. It would be unfair to local residents to consider it ‘Grey Belt’ out of the blue now. Grandview Stables, Grandview Road (GB34) The Council’s justification for classing it as ‘Grey Belt’ land seems to be that Green Belt used for equestrian purposes can be seen as less open and accessible and therefore make a lower contribution to the functions of Green Belt¹. Grandview Stables is a classic rural land use. It preserves openness and									

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											supports recreation. It should not be downgraded. The Council’s classification of these parcels as “Grey Belt” is unjustified and dangerous. None of the sites above meet the Government’s suggested criteria for such a label, they are not derelict, they are not redundant, and they are not expendable. Each makes a clear and demonstrable contribution to the Green Belt purposes set out in the NPPF. By applying the “Grey Belt” label the Council are not protecting the Green Belt but putting it at risk. Should the Plan be found unsound, these will be the first sites the Inspector turns to. That is why I urge the Council to review their classifications and to give the residents who live around each site the explicit opportunity to argue against the label before the examiners are invited to reassign their fate. Most importantly, I reiterate that the Borough’s housing needs cannot and should not be met by sacrificing these vital sites. A better and more balanced									

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											alternative, infrastructure-led growth at the appropriate location, namely North West Thundersley (the Blinking Owl site), is available and would protect the Borough’s most treasured open spaces while also giving the Plan a realistic prospect of being found sound. I think it is profoundly wrong dishonest to not classify all or if not significantly more of the site as ‘Grey Belt’ when it features far more derelict, underused and plotland sites that provide little or no amenity to local residents. I urge the Council to further consult with local residents specifically around ‘Grey Belt’ sites who many not be aware of the significance of the label and the implications of it if the Council’s plan is found flawed and unsound by the Inspector.								

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0301-0001	Individual	Tracey	Loughton		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		It doesn't meet the housing target for Castle Point. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u>	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Strategic Flood Risk Assessment (SFRA).
0301-0002	Individual	Tracey	Laughton		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures	Delivery Plan (IDP).	
0302-0001	Individual	Kiet h	Ride r		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	No t Stated		No		It doesn't meet the housing target for Castle Point. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2.	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

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																	and drainage infrastructure.	<u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Castle Point Strategic Flood Risk Assessment (SFRA).

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0302-0002	Individual	Kiet h	Ride r		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No t Sta ted		No		The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u>	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location, site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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																	and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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0303-0001	Individual	Niki	Stoker		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u>	<u>Y - Policy SD3(3)</u> 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Strategic Flood Risk Assessment (SFRA).
0303-0002	Individual	Nikki	Stoker		Yes	C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			Not Stated		No		The number of Canvey West homes puts residents in the East at risk with emergency	Needs of emergency services considered in the supporting Infrastructure	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	evacuation procedures	Delivery Plan (IDP).	
0304-0001	Individual	Linda	Godman		Not Stated	Had 4	Not Stated	I strongly object to the proposed development to build 114 homes on the field in Scrub lane. The road is already regularly congested and the planned buildings will not be in keeping with the other houses. Also the doctors surgery is at full capacity	Not Stated				Not Stated		No		I strongly object to the proposed development to build 114 homes on the field in Scrub lane. The road is already regularly congested and the planned buildings will not be in keeping with the other houses. Also the doctors surgery is at full capacity	Concerns noted. Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The plan has been subject to detailed Transport Assessment, assessing impacts and recommending interventions.	N
0305-0001	Individual	Rita	Stoker		Yes	SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.	Not Stated		No		Doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred	N

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											guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						the exclusion of North West Thundersley. Add North West Thundersley site. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
0305-	Individual	Rita	Stoker		Yes	C4	No	Canvey West homes puts residents in the East at risk	No	Not Stated			Not		No		The number of Canvey West	Needs of emergency	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0002								with emergency evacuation procedures.					Stated				homes puts residents in the East at risk with emergency evacuation procedures	services considered in the supporting Infrastructure Delivery Plan (IDP).	
0306-0001	Individual	PJ	Ford		Not Stated	SP3	No	Dear Sir/Madam, Following my visit to your offices yesterday and conversation with your officer, please accept the following as my Consultation Response to the Castle Point Plan Reg 19 Consultation. I do not support the Castle Point Plan Regulation 19 Draft Consultation and I believe it is not legally compliant as it has no credible five years housing supply.	No	Positively Prepared, Justified, Consistent with National Policy	And by failing to meet the statutory housing target calculated using the Standard Methodology, it is not compliant with national policy, has not been positively prepared and therefore is unsound. Please see the justification below. In calculating its windfall allowance of 45 homes per year, the council appears to have included the car park at Westwood Court Sheltered Unit as a site identified as suitable to support windfall development. This is not the case. The car park is already used to capacity to support the residents of the complex. The area is also a cul-de-sac housing a school entrance that already suffers from congestion and further housing in this area would add to an already hazardous hot spot. The Plan fails to consider reasonable alternatives when including this site as part of its windfall allocation. Residents affected have not been sufficiently consulted on allocation this prior to the draft plan being prepared	PROPOSED MODIFICATIONS: Add North West Thundersley site Reduce densities in the Urban Town Centres Removal of Westwood Court Car Park from windfall allocation	Not Stated		No	A	Objects to Had4 The proposal for 114 homes is excessive and unsuitable for this location. The plan relies on a 100 dwellings per hectare (dph) urban density guide, whereas the surrounding area currently averages closer to 20dph. This would mean blocks of flats up to four storeys high, completely out of keeping with the existing character of Scrub Lane. The claim that the design would reflect the surrounding area is misleading, as the opposite side of Scrub Lane has far lower density housing, around 15dph, and the proposed development would not blend with the existing street scene. Introducing 114 homes and over	Comments noted	N

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											and the evidence document identifying it on the map, the Castle Point Housing Capacity Topic Paper, was only uploaded on 15th August, two weeks after the Reg 19 Consultation on the Plan opened. The over development of the urban areas of Hadleigh is not sustainable. It does not take into account parking issues that have been consistently ignored in the area and exacerbating these will not support the existing traders due to falling footfall. The council's own sustainability evidence confirms that air quality will be poorer when dwellings are intensified in the urban areas. I believe NW Thundersley has not been adequately pursued as a sound, reasonable alternative. Finally, I believe Members have predetermined their decision of allowing no Green Belt to be included as a development site in the plan and this is to the detriment of the borough as a whole. Their online and in person treatment of residents questioning their approach has compromised the consultation process through intimidation and misinformation.						200 cars would put huge pressure on the already busy Scrub Lane/Rectory Road junction and increase strain on local services, particularly doctors' surgeries. Additionally, pressure on local schooling and other infrastructure. Therefore to avoid putting further pressure on the local residents, ensuring that double yellow lines are put on all local roads to avoid the 200 cars parking locally, more doctors, more schools, more dentists, more local amenities, improved facilities (pipes / sewage). Residents have consistently supported the protection of Green Belt land and the use of brownfield sites for new housing. Nowhere did residents agree to destroy areas like Scrub Lane through inappropriate overdevelopment. I understand land		

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																	will be built on but this is unsustainable and therefore should be more fitting to suit the current infrastructure - for example 4 luxury homes. It is also worth noting that there some very old trees at least 20, all oak except one, an ash, not larch which should be preserved.		
0307-0001	Duplicate representation received. See representation 1086-0001.																		
0308-0001	Duplicate representation received. See representation 1087-0001.																		

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0309-0001	Individual	Matthew	Miller		Yes	SP3	No	Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led.The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	No		No		Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point, and site selection Ignores Greenbelt / Grey Belt against new NPPF guidelines. NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The proposed 3316 urban homes for Canvey is not resident led. The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Charfleets Industrial estate: It's inclusion as a brownfield site for	<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u>	<u>Y - Policy SD3(3)</u> 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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											are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.						development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the businesses on the Charfleets Industrial estate.	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). <u>Charfleets Industrial Estate</u> is included within Policy E1 which includes the statement '	Strategic Flood Risk Assessment (SFRA).

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																	The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes.	the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes.	
0309-0002	Individual	Matthew	Miller		Yes	C4	No	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated			No		No		Failed to consider strategic alternatives like North West Thundersley No credible five-year housing land supply. Ignores Greenbelt / Grey Belt against new NPPF guidelines. North West Thundersley site excluded NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply:</u> See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circums

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																	and drainage infrastructure, The proposed 3316 urban homes for Canvey is not resident led. The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Charfleets Industrial estate inclusion as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site. The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey	between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flood Risk and Infrastructure</u> Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site	tances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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																	Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000.	circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. <u>Emergency Services</u> Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). <u>Charfleets Industrial Estate</u> is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes	

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0310-0001	Individual	Martin	England		Yes	SP3	No	The draft plan is not legally compliant as it fails to consider strategic alternatives, like North West Thundersley, which has been excluded, the biodiversity and environmental protection needs strengthening, there is no credible five-year housing land supply and a lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined. You only need to examine the credentials of the local plan board councillors to realise the biased ideology they have brought to this local plan process. The obviously contrived error in the Reg 19 local plan consultation, having to open the process up again, is legally incompetent, with no justification except a politically motivated manipulation of the results, which needs investigating.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000 Dredge Canvey Lake Revise Had4 Scrub Lane development to 20 homes. Remove the Had3 Hadleigh Clinic site from the local plan5 Remove Manor Trading Industrial Estate site from the plan. Remove Charfleets Industrial Estate site from the plan. Remove the Thun3A Thundersley Clinic site from the local plan	Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found	No	A	Fails to consider strategic alternatives, like North West Thundersley. Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley The biodiversity and environmental protection needs strengthening. There is no credible five-year housing land supply, nor does it meet the housing target for Castle Point. Lack of evidence on cross-boundary infrastructure with a duty to cooperate. The policy of not	<u>Duty to Cooperate</u> addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4)	N

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											and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. The Reg 19 Local Plan Consultation document, published in July 2025 does not comply with the IDP document issued in May 2025. For example, the IPD document states 1000 homes max for Canvey West, but two months later that has been increased to 2700 homes, without any evidence. The IPD document states 80 homes for Scrub Lane, but two months later that has been increased to 114 homes, without any evidence. This was never resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and			unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will			building on the Greenbelt is biased and predetermined. Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Add the Greenbelt / Grey Belt sites of Kings Park HO31. Add the Greenbelt site of Land East of Manor Trading S0145 SHLAA 2018. Reduce the urban housing target to 3500 from 6200,	outlines why North West Thundersley was not preferred. <u>Housing Numbers</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August	

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
											drainage, and flooding implications.The Councils proposal for 6,196 homes on Brownfield only is urban destruction, and unsustainable. The Borough already has major issues where the roads are gridlocked, with traffic lights, road works, water pipe leaks, sewage system failure, gas pipe leaking, powers surges, flooding, drainage blocked, the doctors are full, there are no dentists, no school places, and the residents complain constantly. This needs to be addressed with a new site to be considered in North West Thundersley. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.The DAC Planning Grey Belt document states the North West Thundersley site is not viable, but they were told by officers in the council to add a note “not to consider” North West Thundersley. There were also two NWT Dove Reports published on the Council’s own website, with maps and plans for NWT, but they have mysteriously been removed from the website recently. This makes the removal of evidence worse than the lack of evidence.			cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thunde			with Canvey at 1050, Benfleet at 347, Thundersley at 643, and Hadleigh at 305, keeping Existing Commitments 480, and Windfall Allowance 675. Total housing target of 11,000		2025. <u>Housing Supply</u> : See housing topic paper. Plan to provide for rolling 5 year housing land supply <u>Green Belt/Grey belt</u> covered under policy GB2. The Green Belt Assessment July 2025 reviewed all potential sites within Castle Point’s Green Belt, these sites were then considered against further criteria including: environmental and heritage designations, flood risk, highways issues which impact viability, sustainability as well as having regard for the Essex LNRS and strategic opportunity areas for biodiversity improvements. Any potential grey belt sites identified within the Green Belt	

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											There is no justifiable reason to not consider North West Thundersley.			rsley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with				Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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														this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development across our precinct					

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														us Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been serious					

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														ly considered, like NW Thunderley.					

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0310-0002	Individual	Martin	England		Yes	Had 2	No		No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found	No	A	Had2, for the Hadleigh Farm area needs protection as an open space, promoting the heritage value with the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. We need a C6 Policy (Green lung) for this farmland, the South Hadleigh Green Lung + protection as Local Green Space. Agricultural land: As stated in the agricultural land document date June 2025, just over twenty-one percent of Castle Point's land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough's character and will be important to preserve. Also, given that the purpose of preservation is long-term food	Policy Had2 comments noted Agricultural Land See Policy ENV6 and supporting evidence 'Agricultural Land in Castle Point' (June 2025)	N

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											precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. I do totally agree with the policy Had2, for the Hadleigh Farm area, which talks about this site as environmental, recreational, nature recovery (LNRS), biodiversity (APIBs), agricultural, farming activities, nature conservation, Site of Specific Scientific Interest, Ramsar site, East Coast Flyway World Heritage site, ecological restoration, habitat creation, and connectivity. This site needs protection as an open space, promoting the heritage value with the Castle, and whatever is			unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will			security, the benefit of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever.		

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											planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I concur that the Had2 policy is about protecting this greenbelt site as not suitable for development, with respect to urban sprawl, it is a buffer zone, the effect on the highways and traffic, the lack of infrastructure, protecting our farmland, protecting the wildlife, out of character, open space, heritage, archaeology, promoting the historic links, and that we should use grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. This is confirmed by the Housing Capacity Topic Paper - August 2025, which confirms sites GB8 A&B are not Potential Grey Belt, with that the complete site or sub-areas are not recommended for further consideration. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. The Salvation Army and their developers should be told in no uncertain terms that this farmland is not for development ever.			cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thunde					

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											We need a C6 Policy for this farmland, the South Hadleigh Green Lung. The south Hadleigh Green Lung will be protected and enhanced as a strategic green infrastructure asset between Hadleigh and Leigh on Sea. Its key role will be connecting ecological networks, protecting its ecological value, provide a strategically important ecological corridor, securing a high level of biodiversity net gain, have no adverse impact on the integrity of nearby habitats sites, support the creation of new habitats, through Biodiversity Net Gain, Countryside Stewardship, to support the habitat priority measures, with the nature recovery strategy and as an area of particular Importance for Biodiversity. The Plan’s approach to biodiversity and environmental protection needs strengthening and developments should not proceed where it results in significant harm to biodiversity or protected sites unless that harm can be fully mitigated. As stated in the agricultural land document date June 2025, just over twenty-one percent of Castle Point’s			rsley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with					

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											land is in agricultural use, and the remaining agricultural areas in the Castle Point are increasingly fragile but contribute greatly to the Borough's character and will be important to preserve. Also, given that the purpose of preservation is long-term food security, the benefit of preserving agricultural land applies regardless. Once the graded agricultural land is lost to development, it is lost forever. This complete site should be included for neighbourhood plans and local green space designation. This is based on the listed assets of community value, visitors, conservation areas, registered historic site, local nature reserve, Sites of Special Scientific Interest, footpaths and cycle routes, country parks, rural footpaths and nature trails, and public rights of way. This site has areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. I can fully support this policy Had2 with no housing development ever on this farmland site, but an			this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development across our precious					

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											unsound plan makes this site a high risk. Adding the North West Thundersley site as an alternative has been consistently dismissed by councillors, on social media, and their own website, without foundation, as a scheme for road access was positively discussed by CPBC, ECC and Basildon Council many years ago, see attached photo. Our councillors say it is not viable, but they have not proposed any plan for this site for ECC to review and object to. As a campaign, the Save Hadleigh Farmland Group have their own views and opinions, which have been constantly abused by councillors on social media, to discredit me and the campaign, which continued during the consultation process, even into the last week. The SHF campaign group held a social event, at 2.15pm on Saturday 20th September, to discuss various points including the local plan consultation, and residents were intimidated by three PIP councillors that turned up outside, in an attempt to discredit our opinions, who were handing out their own leaflets was a blatant attempt to undermine public participation in the			us Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been serious					

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											consultation, to deter residents from providing their views and engaging in the consultation process, thus weakening the plan's justification and effectiveness, see attached photos. This means they only want responses from the community that they approve of and their own leaflet was a fabricated biased view of political ideology, with predetermination set in most paragraphs, if you accept one piece of Greenbelt, you accept them all, and political parties and councillors are fully entitled to have views, which is predisposition, but when that agenda and those views affect your decisions making process it is predetermination, see the leaflet attached. This should be investigated by the inspector.			ly considered, like NW Thundersley.					

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0310-0003	Individual	Martin	England		Yes	Had 4	No		No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found	No	A	Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane Density out of character Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Parking Capacity Any application for homes on this site will have to comply with policy T7 which requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details.		N

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											precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as			unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will					

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											the houses opposite relates to approx. 15dph and it will never match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Rod traffic lights. This resident led local plan said protect the Greenbelt and use the Brownfield sites, but the resident's responses did not say to destroy those areas like Scrub Lane with over development. This policy is the perfect reason why you need to add the North West Thundersley site as an alternative site, that gives us the housing numbers required, driven by an infrastructure first policy and we can reduce the over development of our urban sites across the borough.			cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thunde					

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														rsley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with					

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														this plan that puts over three thousands houses on Canvey Island, but when found unsound, will lead to speculative development across our precio					

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														us Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been serious					

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														ly considered, like NW Thundersley.					
0310-0004	Individual	Martin	England		Yes	Had 3			No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to	No	A	Remove the Had3 Hadleigh Clinic site from the local plan	Noted	N

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											exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The Had3 Policy is a perfect example of the over development urban policy,			why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt					

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											with an unrealistic and unwanted proposal for 14 homes. The Hadleigh Clinic is used by many local elderly residents from Hadleigh, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provide the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfil its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to Policy Infra3, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42 states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.			elt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viable sites available					

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														which have not been seriously considered, like NW Thursley. Also, as a Committee Member for the Friends of Canvey Lake group I would like					

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														to put the case forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island, but when found uns					

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														ound, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when ther					

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														e are viable sites available which have not been seriously considered, like NW Thunderley.					

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0310-0005	Individual	Martin	England		Yes	C7		CPBC Plan Page 46+J559 4.01 Extract from the 6-Point Plan for Canvey Island, concerning Canvey Lake. "The Section 19 F+J559	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found	No	A	Dredge Canvey Lake Policy C7 Agrees with improving the Canvey Lake area being master planned as a multi-functional well-used green space. Development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. Over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.	<u>Policy C7</u> comments noted <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDS Policy SD3 covers SuDS and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location, site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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											and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. I do agree with Policy C7 about improving the Canvey Lake area and will be master planned as a multi-functional well-used green space. This will deliver an			unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will							Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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											increased capacity of the Lake from dredging for flood water storage (attenuation area), reducing flood risk to those living on the periphery of the lake, a long-term management plan of the lake to ensure the flood mitigation remains effective, improvements to water quality, a long-term management plan to maintain high quality water standards, enhancements to the habitat surrounding the lake, an environment to create an attractive and functional area, and also identified as an area of particular importance for biodiversity within the Essex Local Nature Recovery Strategy which is protected and where possible enhanced. I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and during times of higher rainfall Canvey Lake becomes an important depository for excess rainwater, that poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve the natural environment in this area and achieve the best outcomes for the natural environment, and that			cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thunde					

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											further work should be undertaken into the functionality of the lake and how water quality, with surface water runoff contaminates, should be managed and maintained in the future, that the Canvey Island 6 Point Plan was undertaken in 2015, which identified Canvey Lake as an important asset in managing flood water on the Island, particularly during storm events, and recommended that the capacity of the lake should be investigated, addressed, and achieved through dredging and re-profiling the banks of the lake to provide additional storage capacity, with planned regular maintenance, which would provide huge benefits for the surrounding homes, which are impacted by flooding in this area, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life, there are risks to wildlife due to the water quality, however, there are huge opportunities to improve this through management of the water and to enhance wildlife through creation of new and improved habitats. This is the vision we need for Canvey Lake.			rsley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with					

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														this plan that puts over three thousands houses on Canvey Island, but when found unsound, will lead to speculative development across our precinct					

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														us Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been serious					

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														ly considered, like NW Thundersley.					
0310-0006	Individual	Martin	England		Yes	Hou5			No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield		Yes	As Head of the Save Hadleigh Farmland Group I would like to put	No	A	Policy Hou5: Concentrations of older people increases pressure on health services but HO31 could offer a doctor's surgery as part of the S106 agreement. All our homes are robust, make provision for cold weather and risk from flooding. The Hou5 Policy states, that the siting of most park homes on the	Park Homes and Pressures on Health Services Noted.	N

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											sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures, and there is no emergency evacuation procedure for Canvey Island. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites			the case for ward as to why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across			existing sites will not require new planning consent as their provision is permitted under the existing consents for the use of the site as a caravan park. We can fully support a policy that adds homes to the local plan, in the right place, but the Hou5 Policy should allow further development which improves the overall site environment for the residents. The local plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.		

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											need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites, and concentrations of older people increases pressure on health services but HO31 could offer a doctor's surgery as part of the S106 agreement. All our homes are robust, make provision for cold weather and risk from flooding. The Hou5 Policy states, that the siting of most park homes on the existing sites will not require new planning consent as their provision is permitted under the existing consents for the use of the site as a caravan park. We can fully support a policy			loss of our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are					

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											that adds homes to the local plan, in the right place, but the Hou5 Policy should allow further development which improves the overall site environment for the residents. The local plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.			viable sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey					

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														Lake group I would like to put the case forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island					

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														nd, but when found unsound, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt					

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														sites on Canvey, where there are viable sites available which have not been seriously considered, like NW Thundersley.					

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0310-0007	Individual	Martin	England		Yes	B8			No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found	No	A	Policy B8 Manor Trading Estates (MTE) inclusion as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties.	<u>Manor Trading Estate</u>: Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states 'It is not the intention of the Master Plan to result in a loss of employment on this site. Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	N

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											precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The inclusion of the Manor Trading Estate (MTE) as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity			unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will					

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
											of new residential properties. This B8 policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on MTE. The B8 Policy for MTE will result in restricted economic growth, reduction in protected employment area, unemployment, force business to move to Canvey, and housing over employment is not an option. This policy is not evidence based, but records show poor engagement verging on negligent engagement, and officers have not engaged with the majority of the 120 businesses on the MTE. CPBC vision is to create an environment that promotes business on MTE, by removing a 25% of its employment space for housing. This vision will mean MTE businesses will be forced to move to Canvey employment zones, as previously suggested that any increase in commercial / industrial area could be accommodated on Canvey. ECC will relay objections in that any residential units near protected facilities will			cau se unt old issu es to the loc al urb an are as, whe n ther e are viab le site s avai labl e whi ch hav e not bee n seri ous ly con sid ere d, like NW Thu nde					

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											undoubtably increase noise complaints. CPBC's Officers Mapping area the MTE is incorrect and misleads the public, as MTE is a max of 12.5 Ha and not the 14 Ha stated, as it does not include the properties which all front Church Road. The MTE Road & footways network is privately owned, so who will fund the new roads, footways, and cycle paths across private land. The future plans for Manor Trading Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Manor Trading Industrial estate for housing, with business integrated with residential homes.			rsley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with					

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														this plan that puts over three thousands houses on Canvey Island, but when found unsound, will lead to speculative development across our precio					

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														us Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been serious					

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														ly considered, like NW Thundersley.					
0310-0008	Individual	Martin	England		Yes	C4			No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the	No	A	Charfleets Industrial estate: No reasoned justification for using the Charfleets Industrial estate for housing, with business integrated with residential homes. Remove Manor Trading Industrial Estate site from the plan. Remove Charfleets Industrial Estate site from the plan.	Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable	N

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											considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of			case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across				prospect for the site to be used for these purposes.	

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											urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on			our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are viab					

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											negligent engagement, and officers have not engaged with the majority on the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with business integrated with residential homes.			le sites available which have not been seriously considered, like NW Thundersley. Also, as a Committee Member for the Friends of Canvey Lak					

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														e group I would like to put the case forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island,					

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														but when found unsound, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt site					

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														s on Canvey, when there are viable sites available which have not been seriously considered, like NW Thundersley.					

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0310-0009	Individual	Martin	England		Yes	SP3			No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography		Yes	As Head of the Save Hadleigh Farmland Group I would like to put the case forward as to why our site is still at risk with a local plan that will be found	No	A	Essentially the same points as made in Rep 0310-001 above by the same respondent on Policy SP3	Essentially the same responses made to Rep 0310-001 above by the same respondent on Policy SP3	N

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											and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites. The Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council			unsound, which will then lead to speculative development across our precious Greenbelt sites. Also, the over development with this plan will					

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											have made no contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms for NW Thundersley. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, Essex County Council, and infrastructure providers throughout the planning process to consider the viability of NW Thundersley. The Council will also have regard to Essex County Council's (ECC) Developers' Guide to Infrastructure Contributions. ECC play an important role as an infrastructure provider in Castle Point. The IDP fail to address the infrastructure needs to meet the growth within the Borough, with a development on the scale of NW Thundersley. ECC have had no plan to review over the NW Thundersley, and the council continue to categorically state that access from the A130 is not viable, and Essex County Council refuse to permit an access to the A130 but plans show a scheme was positively discussed by CPBC, ECC and Basildon Council many years ago.			cause untold issues to the local urban areas, when there are viable sites available which have not been seriously considered, like NW Thundersley					

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											but this has been ignored, see attached photo. This scheme shows what can be achieved with dialogue, the intention to progress positively and working in partnership. The ECC website states, in their Development Management Policy, all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies, where vehicular access is accepted in principle, the number of access points will be kept to a minimum and new access points will be designed and constructed in accordance with the current standards, where existing access is to be used substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road, and all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network. The NW Thundersley site should be added as an alternative, with 50% of the area on the call for sites and 50% of the area is grey belt factoring in PDL, but not one site has been added to the local plan.			rsley. Also, as a Committee Member for the Friends of Canvey Lake group I would like to put the case forward as to why our lake is still at risk with					

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														this plan that puts over three thousand houses on Canvey Island, but when found unsound, will lead to speculative development across our precinct					

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														us Greenbelt sites, with the additional houses on our Grey Belt sites on Canvey, when there are viable sites available which have not been serious					

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														ly considered, like NW Thundersley.					
0310-0010	Individual	Martin	England		Yes	Thun3A			No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet two of the national planning policy standards, which are meeting the housing target of 11,662 for Castle Point, with 6,200 being only 53% of the target, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified as your site selection strategy is biased towards a "no greenbelt build policy", is solely based on the "over development of Brownfield		Yes	As Head of the Save Hadleigh Farmland Group I would like to put	No	A	Objecting to THUN3 because: Accessible clinic should not be removed	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N

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											sites", you have not considered all sites, as Greenbelt sites under 100 homes were excluded, sites on SHLAA 2018 were ignored, using only Brownfield sites, and the exclusion of North West Thundersley undermines the claim, no Greenbelt / Grey Belt sites have been added, despite a six month delay to review, a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can			the case forward as to why our site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across					

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											reduce the over development of our urban sites. The Thun3A Policy is a perfect example of the over development urban policy, with an unrealistic and unwanted proposal for 24 homes. The Thundersley Clinic is used by many local elderly residents from Thundersley, who have no transport available, who walk to these clinics, and there will be no local alternative provided elsewhere nearby. The levels of health service provision must be maintained or improved with a local health hub but not removed. There is no justification to close this clinic, to re-provide the same service elsewhere in the Thundersley area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfil its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to Policy Infra3, Improving Health and Wellbeing, paragraph 19.41 states, there are currently four community clinics in Castle Point, so with the Had3 & Thun3A policies these will be reduced by 50% and paragraph 19.42			loss our precious Greenbelt sites. Also, the over development with this plan will cause untold issues to the local urban areas, when there are					

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											states, there is currently a deficit in GP practice space in Castle Point. and as new residential development is permitted, new healthcare space is required, which contradicts the Had3 & Thun3A policies.			viab le site s avai labl e whi ch hav e not bee n seri ous ly con sid ere d, like NW Thu nde rsle y. Als o, as a Co mm itte e Me mb er for the Frie nds of Can vey					

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														Lake group I would like to put the case forward as to why our lake is still at risk with this plan that puts over three thousand houses on Canvey Island					

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														nd, but when found unsound, will lead to speculative development across our precious Greenbelt sites, with the additional houses on our Grey Belt					

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														sites on Canvey, when there are viable sites available which have not been seriously considered, like NW Thundersley.					
0311-0001	Individual	Hannah	Cox		Not Stated	Had 4	No	I object to the building of new homes in relation to the about policy reference The Had4 Policy is a perfect example of the over development urban policy, with an unrealistic proposal for 114 homes, using the	Not Stated	Not Stated	The statement that the frontage of the development is designed to reflect the character of Scrub Lane, is a complete fabrication, as the houses opposite relates to approx. 15dph and it will never		Not Stated		No		Policy Had4 Policy: Objects as it is over development urban policy, with an unrealistic proposal for 114 homes, using the Castle Point	Noted	N

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								Castle Point Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area.			match the current street scene. The addition of 114 homes, and over 200 cars, would cause major issues at the Scrub Lane / Rectory Road traffic lights. The addition of 114 homes would add over 300 people to the Hollies surgery. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage in these urban areas. Residents said use the Brownfield sites, but not to destroy those areas like Scrub Lane with over development. It also says the loss of playing field land is mitigated by an appropriate financial contribution towards new or enhanced playing field facilities nearby, so does this include the school field.						Density and Capacity Study, and a 100dph urban guide, in a residential area of housing currently having homes at 20dph. Housing on this site at 100dph would equate to six blocks of flats, four flats per floor, and four stories high, which is out of character for the area. Disagrees that it can be designed to reflect the adjacent character of Scrub Lane.		
0312-0001	Individual	Jill	Walsh		Yes	Had 4	No	Dear Sir/Madam I do not support the Castle Point Plan Regulation 19 Draft Consultation. It is not legally compliant as it fails to meet the Governments housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines.	No	Justified, consistent with national policy	I do not believe this to be an effective, sound or justified policy. Housing density, with a suggested proposal of 114 homes, would be totally out of keeping with the surrounding area. Scrub Lane consists, for the main part, of detached houses with a housing density of 15 dph, totally at odds with the proposed 100dhp. Scrub Lane is a busy road, especially during rush hour and school run times. The proposed development could	I believe it is imperative that this plan must introduce the controlled release of some Green Belt on the main land to reduce significantly the number of houses presently being considered for Canvey Island.	Not Stated		No		Policy Had4 Policy: Objects on over-development, highways, local character. Cites mature oak trees on site.	Had4: Noted	N

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											potentially add a further 228 motor vehicles entering/exiting the site, leading to and adding to the traffic chaos that occurs every day during the peak times. Scrub Lane is also a well known rat run for vehicles to avoid the High Street. The junction of Scrub Lane/Rectory Road/New Road is traffic light controlled , with normally about six cars exiting Scrub Lane before the lights are against them - queues at peak times often extend back over 200 yards - further traffic will only compound the problem. 10.29 'Pedestrian, cycling and public transport measures connecting to the town centre, nearby facilities and services and Hadleigh Infants and Nursery School will be required. Main vehicular access will be from Scrub Lane.' Public transport measures connecting to town centre ...will not be required and are not viable. The Lane has numerous speed bumps and is not suitable or wide enough to permit the use of buses. The town centre itself is a matter of a five minute walk away. There are a number of mature oak trees on the site, which absorb harmful carbon dioxide to fight climate change, cool the								

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											planet by providing shade, prevent soil erosion and flooding with their roots. Together with a long stretch of hedgerow this area provides a home to a large variety of birds and families of foxes (at least two distinct families, each having produced two cubs this year). Nature needs protecting, not having their habitat destroyed. There is only one GP practice in Hadleigh which is already struggling to provide appointments for patients. A further potential 228 patients (estimated at a minimum of 2 people per dwelling) would be unsustainable for the practice. This proposal is quite clearly overdevelopment, with a lack of accompanying infrastructure and places enormous pressure on local drainage and sewage.								
0312-0002	Individual	Jill	Walsh		Yes	Had 1	No		No	Not Stated	HAD1 -Page 66 This policy in my opinion is unsound Further urbanisation of Hadliegh town centre will result in traffic flow coming to a virtual standstill, unless the necessary infrastructure is already in place, which it clearly will not be. The suggestion of development of the Hadleigh Island would seem to suggest the removal of the Library - a community meeting place		Not Stated		No		Policy Had1: Objects as unsound and Highwayss impacts. Concern about possible loss of library. Canvey: Objects to level of development on Canvey. Concerns on access, 2 COMAH sites	Had1: Paragraph 19.39 of the Plan confirms that 'The Council will work closely with ECC to ensure ongoing access to library services for residents'. Part3 of Policy Had1 confirms that community facilities and cultural uses will	N

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											which is well utilised, not just for borrowing books but also by various groups within the community including the Community fridge, as well as access to computers, printing facilities (again, both well utilised) and would be a great loss to the community.							b e included in the scheme. Paragraph 10.16 states there is scope 'to better provide the community uses'.	
0312-0003	Individual	Jill	Walsh		Yes	SP3	No	Finally, Canvey Island - P38 onwards To suggest the development of over 3,000 dwellings on Canvey Island is unsound and not justified. It is a flood zone 3a area, had one major road to enter/exit the Island and has 2 COMAH sites. There is clearly and unequivocally an imbalance of housing allocation compared to the mainland area in Castle Point, with an obvious bias towards the policy of no building on the Green Belt, to the detriment of Canvey Island. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. The proposed developments place residents in the east of the Island at risk in the event of an emergency evacuation procedure. t is ludicrous to suggest that Canvey Island has been allocated this huge amount of development when compared to other areas on the mainland	No	Not Stated			Not Stated		No		To suggest the development of over 3,000 dwellings on Canvey Island is unsound and not justified. It is a flood zone 3a area, had one major road to enter/exit the Island and has 2 COMAH sites. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. The proposed developments place residents in the east of the Island at risk in the event of an emergency evacuation procedure. I believe it is imperative that this plan must introduce the controlled release	Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ‘ A Better Connected Essex’ has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan. Needs of emergency services considered in the supporting	N

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																	of some Green Belt on the main land to reduce significantly the number of houses presently being considered for Canvey Island. It is ludicrous to suggest that Canvey Island has been allocated this huge amount of development when compared to other areas on the mainland	Infrastructure Delivery Plan (IDP). Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0313-0001	Individual	Lucy	Olofinjana			SP3	Not Stated	Hello I am extremely concerned about any plans for building in the areas surrounding Sadlers farm roundabout, including any potential of hundreds of homes at Jotmans farm going onto Canary way. Canvey only has two roads in and out, so Canvey Way cannot possibly cope with extra cars from a large development. The area is already very congested when one small thing goes wrong on Canvey, Benfleet or Rayleigh. It has taken 1.5 hours in the past to travel from pitsea (my son's school) to benfleet due to traffic after an accident. Hundreds more homes cannot possibly be considered in this area.	Not Stated	Not Stated						A	Concerned about any plans for building in the areas surrounding Sadlers farm roundabout, including any potential of hundreds of homes at Jotmans farm going onto Canary way. Canvey only has two roads in and out, so Canvey Way cannot possibly cope with extra cars from a large development. The area is already very congested when one small thing goes wrong on Canvey, Benfleet or Rayleigh.	<u>Canvey Access</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy 'A Better Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex	N

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																		Implementation Plan	
0314-0001	Supporting Evidence provided to supplement representation. See representation 1097-0001.																		
0315-0001	Individual	Irena	Grant			SP3	Not Stated	I have only just been made aware of this and see the consultation is now closed! Why was it not more publicised?	No	Consistent with National Policy	I find the proposal to be unsound as the plan is for 7 thousand new homes but the Govt target for Castlepoint, as far as I can see, is twice that figure. Why hasn't the site at North West Thundersley been added? It has a good route in and out of the borough (with a few tweeks) and it will not further congest areas that are already congested on a daily, if not hourly basis, such as Hadleigh A13. I hope you will add my objection to your consultation and if possible reopen/extend the consultation with a greater publication of its existence so more residents are able to submit their views.						Objects to the exclusion of North west Thundersley	North-West Thundersley Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West	N

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																		Thundersley was not preferred.	
0316-0001	Individual	Amy	Thompson			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.				A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered,	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide

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																	no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0316-0002	Individual	Amy	Thompson			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated						A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0317-0001	Individual	Brian	O'Grady			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Strategic Flood Risk Assessment (SFRA).
0317-0002	Individual	Brian	O'Grady			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated							The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0318-0001	Individual	Chris	Portis			Had 4	Not Stated	Hello, I tried to sign and comment on the above sites application /plan but when on website i simply received 'error code 404'I which may or may not have been intentional and was unable to complete the form. The	Not Stated	Not Stated						A	Objects to Scrub Lane site. Overdevelopment, impacts on highways and education infrastructure.	<u>Infrastructure</u> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan	N

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
								idea of 114 new homes in such a small area is without doubt not in keeping with the immediate area and will simply be an eyesore no matter how high the development has to be built . The council are already struggling with finances and so keeping in mind a certain percent of this development will go to unemployed families....it will add to the weight of financial problems the council has. The council has said on many occasions that it is struggling so is this true or not . The homes will attract 1.8 cars per household which means a further 200 cars will hit the immediate area which will cause many traffic problems which will over flow into nearby neighbour hoods . The schools are already over subscribed and the new homes which will house 800 new people 200 of which will be children of school age will well over burden the schools capacity AND will push locals out...locals who have contributed to the area them selves via council tax over the years. The whole idea of this amount of homes is ridiculas ,a third of this amount would suffice and part of the area must be											(IDP). <u>Highways Impacts</u> The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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								kept as recreational for obvious reasons. thanks, Mr Chris Port ,local resident .											
0282-0032	Organisation	Kevin	Fraser	Essex County Council	Yes	D1	Not Stated		No	Effective	ECC consider objective o and the reasoned justification do not fully reflect the principles of inclusive design as 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. 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. ECC seek an additional criteria requiring development to incorporate	ECC require an additional Criteria to read: 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 ECC recommend amendments to paragraph 16.28 to: • refer to dementia-inclusive communities, in line with current terminology and best practice; • refer to enabling people to age well and in place as a core principle of inclusive design. • reflect the needs of people with a range of support needs, including those with cognitive, sensory, mental health, and physical disabilities. • ensure inclusive design expectations include: • Dementia-inclusive features; • Wayfinding and sensory elements; • Adaptable layouts; • Accessible outdoor spaces;	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	To make reference to design principles for Specialist Supported Housing within Policy 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.	Accepted reference to design principles for Specialist Supported Housing added.	

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											multifunctional green and blue infrastructure into the design process from the outset rather than it being an optional requirement. 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. The Green Infrastructure Planning and Design Guide, published by Natural	• Consideration of the needs of different cultures, genders, and disabilities ECC recommend `or` replaces `and` in Criteria 2a and b							

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											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. https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design Guide - Green Infrastructure Framework.pdf 3. Effective 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). 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.								

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0282-0033	Organisation	Kevin	Fraser	Essex County Council	Yes	D1	Not Stated		Yes		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). 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.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Multifunctional green and blue infrastructure should be designed into the development at the outset to ensure that principles of biodiversity improvements, climate change adaptation and wellbeing are successfully achieved. Welcomes references to sheltered and care accommodation within Policy D1 Provide further reference to inclusive and accessible development 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	Accepted Additional text added to incorporate multifunctional green and blue infrastructure into scheme designs Noted 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 Noted	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 Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportu

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																			nities 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
0282-0034	Organisation	Kevin	Frasier	Essex County Council	Yes	D2	Not Stated		No	Effective	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. ECC consider that a bus	ECC require paragraph 16.34 is amended to specify what is regarded as a frequent service to warrant the premium sustainability measure. 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.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of	B	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 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	Accepted clarification made 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.	2. Premium sustainability areas are defined as: a. Sites within 800m of a town centre or railway station; and or

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											stop per se is not a good indicator of “premium sustainability” as they may be served by no buses or by irregular and/or infrequent bus services.				evidence		within the justification text.		b. Sites within 400m of a bus stop with a regular bus service. These facilities are largely located within town centres. 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 should

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																			provide a good level of frequency in order to make reasonable journeys to work, school and to access community services .
028 2-003 5	Organisation	Kevin	Fraser	Essex County Council	Yes	D4	Not Stated		Yes		ECC seek a typo is amended to read `streams' in Criteria 2. ECC support the policy setting out a clear requirement for landscaping and planning condition requirements for management and maintenance plans	ECC require Criteria 2 is amended to read: Pre-existing natural features, including hedgerows, ponds, streams, ditches should be retained and incorporated within the design scheme layout as far as possible.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Typo. Amend to "streams"	Accepted and corrected	2. Pre-existing natural features , including hedgerows, ponds, streams, ditches should be retained and incorporated within the design scheme layout as far as possible .

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0320-0001	Individual	John	Wellmen			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development	Grey belt covered under policy GB2. SLAA and Sa considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point

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																	should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	Strategic Flood Risk Assessment (SFRA).
0320-0002	Individual	John	Wellmen			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not stated							The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0321-0001	Individual	Amy	Bailey			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt	PROPOSED MODIFICATION: Add North West Thundersley site.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. The draft local	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley:	Y - Policy SD3(3) 3. Proposals must demonstrate

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								has no credible five-year housing land supply.			against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	
032 1-000 2	Individual	Amy	Bailey			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not stated							The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
032 2-000 1	Individual	Ole gs	Sara nins			SP3	No	I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply.	No	Justified, consistent with national policy	I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness for justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of	The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound: Consider North West Thundersley Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000. An assessment specifically around Canvey Island with flood zones being assessed and the impact these numbers would have on flooding					Doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. Has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. Over development of urban sites policy across the borough, especially	Consideration of <u>All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and	N

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											Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. The plan needs amending as this unsound plan, for 6,200 homes, will put all Castle Point Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications. Adding the North West Thundersley site as an alternative, gives us the housing numbers required, and we can reduce the over development of our urban sites.						on Canvey, which was not resident led. This over development policy will affect the highways and traffic, the lack of infrastructure, sewage and drainage, and flooding implications.	ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey belt</u> covered under policy GB2. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	
0282-0036	Organisation	Kevin	Fraser	Essex County Council	Yes	D4	Not Stated		No	Effective	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	ECC require the reasoned justification makes reference to the need to consider the Essex Design Guide - Highways Technical Manual - planting in sight splays.ECC require an additional Criteria in 4 to read:	Yes	Not Stated	Yes, ECC supplied 8 additional appendi	B	Welcomes that maintenance issues are considered with the planting of trees. Reference should be made to the Essex Design Guide and Highways Technical Manual	Accepted and references added Accepted and references added Noted	3. The most appropriate tree should be planted within the develop

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											solutions are found that are compatible with highways standards and the needs of different users consistent with NPPF, paragraph 136. 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 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.	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.			ces containing various pieces of evidence		Planting in Sight Splays. Recommends reference is made to the GBI network in the design of landscape schemes Supports policy for setting planning conditions for management and maintenance of landscape schemes		ment, compatible with highways standards having regard to the Essex Design Guide, Highways Technical Manual - Planting in Sight Splays and the needs of different users 4 e. Connectivity to the wider Green and Blue Infrastructure (GBI) network by enhancing ecological connectivity,

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																			supporting biodiversity, and integrating nature-based solutions that promote climate resilience
028 2- 003 7	Organisation	Kevin	Fraser	Essex County Council	Yes	GB1	No	Not consistent with National Policy	No	Consistent with National Policy	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: Within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request amendment to policy to include that development would be accepted in special circumstances within Green Belt	Accepted. Text amended.	1. Development within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances in line with the NPPF.

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028 2- 003 8	Organisation	Kevin	Fraser	Essex County Council	Yes	GB1	Not Stated		No	Effective	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 'exceptional circumstance' 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. This is consistent with Paragraph 43 of the Inspectors Report to the 'withdrawn' Local Plan. Please refer to the response regarding amendments to the Policies Map 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:	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 require paragraph 17.9 is amended to provide commentary with regards the status of the school sites which ECC seek are removed from the Green Belt consistent with the Inspectors Report (Paragraph 43) and Main Modification 67 to the 'withdrawn' Local Plan	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Request amendment to policy to include that development would be accepted in special circumstances within Green Belt Requires that the following School Sites are removed from Green Belt in order to expand if necessary and allocated as education land. • King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island. This would be consistent with the main modification 67 to the withdrawn Local Plan.	Not accepted. 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.	

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
											• King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island.									
0282-0039	Organisat ion	Kev in	Fras er	Essex Coun ty Coun cil	Yes	GB2	Not Sta ted		No	Effective	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.	ECC require the following amendment to Criteria 1a to read: The site is in a high, good or moderately accessible location as identified on the map at Appendix D, and has safe footway access, conforming to established highway regulations;	Yes	Not Stat ed	Yes, ECC sup plie d 8 addi tiona l app endi ces cont ainin g vario us piec es of evid enc e	B	More clarity is required over the accessibility category to include “good”	Accepted and additional criteria added	1a. The site is in a high, good or moderat ely accessi ble location as identifie d on the map at Appendi x D, and has safe footway access, conform ing to establis hed highway regulati ons;	

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0282-0040	Organisation	Kevin	Fraser	Essex County Council	Yes	ENV 2	Not Stated		Yes		ECC welcomes reference in criteria 1 to working with ECC, as the Lead Local Flood Authority, and other partners to prepare a Riverside Strategy. ECC welcome reference in criteria 1a to TE2100 Plan which allows for future seawall defence maintenance and construction.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes criteria to work with ECC as Lead Flood Authority and partners to prepare a Riverside Strategy Welcomes reference to the TE2100 Plan within the policy which allows for future seawall defences.	Accepted, no modifications Accepted , no modifications	5. Development proposals must be designed to protect and enhance ~~enable~~ and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).

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0282-0041	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra1	Not Stated		No	Effective	ECC seek criteria 3 d is amended to refer to access to adequate cycling and walking links as well as public transport provision. ECC seek amendments to Criteria 5 to provide clarification that education (a nursery) 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 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 permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2. ECC seek amendment to paragraph 19.13 to provide clarification that education	ECC require Criteria 3 d is amended to read: Be located in a sustainable location, with access to adequate public transport provision, cycling and walking links; ECC require Criteria 5 is amended to read: 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 , 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. ECC require paragraph 19.7 is amended to delete reference to schools as community uses to read: Many of the community halls and GP surgery buildings within the Borough are ageing and have issues accommodating the services required. ECC require the definition of community uses in paragraph 19.13 is amended to read: For the purposes of this Policy, community facilities can be defined as including children’s play and recreation facilities, services	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	ECC seek criteria 3 “d” is amended to refer to access to adequate cycling and walking links as well as public transport provision. Recommends that nursery provision is not defined as being community use and thereby subject to Policy Infra1. Education should not be defined as community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and change of use only permitted if ECC and other educational providers identify as being surplus to educational requirements. Considers that education facilities and libraries are removed from the definition of community use in INFRA1 The delivery of Infrastructure to support Specialist and Supported	Accepted and amendment made. CPBC agree early years provision should not be lost 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.. 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’	3d. Be located in a sustainable location, with access to adequate ~~and within walking distance~~ of public transport provision, cycling and walking links; 5. In relation to the loss of a locally valued community facility that is commercial in nature, ~~such as a public houses, private healthcare facility or a~~

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											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. 3. Effective 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: • Access to health and care services (referenced in the Infrastructure Delivery Plan, Section 11.3(g)).	for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, community halls, criminal justice facilities meeting rooms, places of worship, public toilets, pubs and post offices. ECC recommends paragraph 19.10 is amended to include reference to infrastructure required to support Supported and Specialist Housing (SSH), including: • Care-ready community facilities • Accessible transport and mobility infrastructure • Digital connectivity to support care-enabled technology ECC recommends that the Infrastructure Delivery Plan (IDP) includes specific reference to SSH-related infrastructure needs.					Housing will need to be considered	use rather than education, as stated in the Reg 19 response CPBC has included reference to Specialist and Supported 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	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. This should include demonstrable evidence that the facility had been placed on the open market for a period of at least one year

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											- Community facilities suitable for people with care and support needs (Policy Infra3 – Improving Health and Wellbeing) - Transport and mobility infrastructure (NPPF paragraph 117b) - Digital connectivity for care-enabled technology (ECC Market Position Statement, 2023)								at the standard market rate, without success.
0282-0042	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra1	Not Stated		Yes		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		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	Community facilities represent a considerable stock of brownfield land supply in the Borough. Many of these schools, community halls and GP surgery community

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											Accommodation Standards.								buildings within the Borough are ageing and have issues accommodating the services required Therefore, community buildings should be designed to allow for disabled access and should be located in order to provide the opportunity for as many people as possible to access the

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																			facility by foot and/or by public transport. Planning applications should provide details of how accessibility has been considered within the design of the development. education facilities

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028 2- 004 3	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra2	Not Stated		No	Effective, justified	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 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. 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	ECC require Criteria 1 is amended to read: 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. ECC require paragraph 19.17 is amended to read: ‘....colleges, libraries, youth facilities, employment and skills measures and other community learning spaces’. Please refer to the detailed response with regards the Infrastructure Delivery Plan. ECC require an additional Criteria be added to the policy to read: The Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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. Proposes the removal of “youth facilities” from the definition for Education facilities. 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. Welcomes reference to the preparation of Employment Skills Plans and for growth to improve local skills and access to	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. 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. 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	1. 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. 4.The Council will seek to improve local skills and access

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											in the Glossary definition of Community Uses. Paragraph 19.20 refers to the Infrastructure Delivery Plan establishing where new educational facilities are required based on the growth identified within the Plan. 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. 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								employment skills and employment through Employment Skills Plans.	Site Policies will be updated according to the results of that assessment. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. Accepted and additional criteria added to emphasise the Council's commitment to improve employment and skills in the borough.	to employment opportunities through Employment and Skills Plans.

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
											assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary. 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. 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: • include apprenticeships, work experience, volunteering, careers information and training; • must be shared with and agreed by the LPA and ECC ahead of the S106 agreement being signed off; • include options such as									

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											the direct delivery or skills and employability programmes, school / college engagement and work experience opportunities, or construction or workplace apprenticeship schemes for local residents; • be secured through S106 agreements; and • 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.								
0282-0044	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra2	Not Stated		Yes		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.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces	B	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	For the purpose of this policy, education facilities include, but are not limited to early years and childcare (full day

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											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.				es of evidence			provision of infrastructure required to make a development acceptable in planning terms providing consistency with this policy	care, pre-schools, child minders , school run early years provision, and ‘wrap around care’ – breakfast, after school and holiday clubs), schools (primary , secondary and Post 16 Education), Special Education Needs and Disabilities (SEND), colleges , libraries, youth facilities , employment and

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																			skills measures and other community learning spaces
0282-0045	Organisation	Kevin	Fras er	Essex County Council	Yes	Infra3	Not Stated		No	Effective	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. ECC recommend paragraph 19.44 is amended to reference the local Castle Point and Rochford Health and Wellbeing Strategy	ECC require paragraph 19.44 is amended to read: 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), the Essex Joint Health and Wellbeing Strategy and the Castle Point and Rochford Health and Wellbeing Strategy.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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. Typo	Accepted and additional criteria added to emphasise the Council's commitment to improve employment and skills in the borough. Accepted	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

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																			the Joint Strategic Needs Assessment (JSNA), and the Essex Joint Health and Wellbeing Strategy and the Castle Point and Rochford Health and Wellbeing Strategy . This will not only involve
0282-0046	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra3	Not Stated		Yes			ECC require the following typo in paragraph 19.50 is amended to read: The Essex Healthy Places document is an advice note on how planners, developers...	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various	B	Typo	Accepted.	The Essex Healthy Places Document is an advice note on how planners , developers and designers can

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															us pieces of evidence				incorporate health into proposals and the key attributes in creating healthy places.
0324-0001	Duplicate representation received - Please see 0269-0001 to 0269-0004.																		
0325-0001	Individual	Ami	Philips			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF	PROPOSED MODIFICATION: Add North West Thundersley site.					Not all sites considered, such as North West Thundersley. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape charact

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											guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.						is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt / Grey Belt sites added. Development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	er and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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0325-0002	Individual	Ami	Philips			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not stated							The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0326-0001	Individual	Ross	Day			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led.	PROPOSED MODIFICATION: Add North West Thundersley site.				A	Not all sites considered, such as North West Thundersley. The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a "no greenbelt build policy". The site selection is based on the "over development of Brownfield sites". Not all sites have been considered, no Greenbelt /	Grey belt covered under policy GB2. SLAA and SA considered all reasonable site options. North-West Thundersley: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council'

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																	Grey Belt sites added. Development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	and IDP, including in relation to Canvey. SUDs: Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).
0326-0002	Individual	Ross	Day			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not stated						A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0327-0001	Individual	Gordon	Retter			SP3	Not Stated	Having tried to study the documentation forming the basis and consideration of the plan, I would simply make the following comments Housing requirements One of my main thoughts concern the housing requirement methodology. How does the government arrive at this figure. The figure of 686 homes per year appears excessive. The councils Local Housing Needs Assessment 2023 identified a need for approx 255 homes per year yet are now proposing 364. WHY? I constantly read that newcomers to Castle Point seem to come from East London and surrounding areas. That doesn't signify local need to me. Whatever the reason, many of these new residents arrive first and then ask about schools, doctors, facilities etc after the event. I believe it maybe a financial incentive to sell property at London prices to then purchase less expensive property here in Castle Point leaving a surplus of funds. Also I believe population levels are reducing. Has this been taking into consideration. Also due to economic conditions many offspring of existing residents remain living with their parents as	Not Stated	Not Stated		Even if such increased housing gets approval, at the very least a third road is required that should incorporate a dual carriageway.					Critical of excessive housing number requirments and questions the methodology behind government numbers. Advocates the HNA 2023 figure of 255homes p/a. Questions whether this is local need or from East London. Believes growth is driven by financial insentives to sell at London prices. Says the urban first approach makes sense. Suggests that the retail parks are actually drawing people into the Borough and that they will decline in future due to the growth of online shopping. Questions whether supporting infrastructure wil be overwhelmed. Holiday plot land does not have proper drainage. Cites indirect source at Anglian Water exprerssing concern. Suggests a third road is needed to Canvey.		Points noted. Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA. Canvey Access The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. The Essex Transport Strategy ' A Better	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circums tances, landsca pe charact er and the green-blue infrastru cture network, and have regard to Essex County Council' s SuDS Design Guide for Essex and the Castle Point

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								homes for many are unaffordable thus logically reducing the need for such increased local building. How were new homes businesses and other facilities locations decided? The urban first approach makes sense but the plan seems to propose the use of existing industrial sites for housing. Also we already have several retail parks on Canvey and another proposed on land opposite Morrisons off Roscommon Way Canvey. Such estates already attract visitors from beyond the borough in addition to its own residents bringing pressure on roads and infrastructure. Increasingly though retail shopping is generally declining due to online shopping so there should naturally be less need in future. Providing the right type of new homes Providing the right type of new homes As much as a convincing argument for more housing there is the overwhelming question of supporting infrastructure. The history of development particularly on Canvey means much uncontrolled building took place. Staking out land of a holiday plot to become proper houses took place on a large scale without proper drainage. I have spoken to an Anglian												Connected Essex' has set out a range of initiatives to improve access links to Canvey. Scheme Details can be found in Appendix A. South Essex Implementation Plan The Council has met with Anglian Water to produce a Statement of Common Ground and agree policies.	Strategic Flood Risk Assessment (SFRA).

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								Water representative (a former neighbour) who told me the drainage system such as it is is a disaster. Inferior pipework joined to new housing pipework is creaking and could well fail on a large scale without any additional housing. We see only too often on Canvey flooded roads evidence of poor condition and maintenance. That's just surface water let alone unseen sewerage drainage. The overriding issue to object to such additional housing is the totally inadequate road system that can't cope with the existing housing stock and vehicle movement. All roads lead to two exits roads off Canvey both single carriageways											
0282-0047	Organisation	Kevin	Fraser	Essex County Council	Yes	Infr a4	Not Stated		No	Consistent with National Policy	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.	ECC require reference to school playing fields in Appendix J and on the Policies Map are deleted so they are not covered by Criteria 1.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evid	B	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

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											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.				enc e				
0282-0048	Organisation	Kevin	Fraser	Essex County Council	Yes	Infra6	Not Stated		Yes		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). 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		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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 reference to the Essex Design Guide and the EOPA Planning Guidance for Digital Connectivity	CPBC agrees that it will be important to collaborate early with digital stakeholders and developers to address communities' digital needs with minimum impact from digital structures. Noted no modifications.	

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											effectively addressing connectivity needs.								
0282-0049	Organisation	Kevin	Frasier	Essex County Council	Yes	Infra6	Not Stated		No	Consistent with National Policy	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).	ECC require paragraph 19.70 is amended to read: However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings and other structures should be encouraged. Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Recommends digital mast sharing and sympathetic designs to minimise impacts of digital infrastructure. Typo to be corrected	Accepted. CPBC agree that mast sharing and good design can minimise the impact of masts on the local area.	However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. Use of existing masts, buildings and other structures should be encouraged. Where new sites are required (such as for new 5G

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																			networks) equipment should be sympathetically designed and camouflaged where appropriate. The Essex Design Guide includes a section on 'Planning for 5G'....
0282-0050	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.4, Page 156	Not Stated		No	Not Stated	ECC require the following typo in paragraph 20.4 is amended to read: The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Typo to be corrected	Accepted	...The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport

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															ence				t emissions:
028 2-005 1	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20.6, 1st sentence, Page 156	Not Stated		No	Effective	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.	ECC require reference to the potential date of adoption of the LTP4 in the 1st sentence is amended to read: Winter 2025/2026	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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.	ECC are currently in the process of updating the LTP, with a new LTP4 scheduled for adoption in 2025 winter 2026.
028 2-005 2	Organisation	Kevin	Fraser	Essex County Council	Yes	T1	Not Stated		No	Positively prepared, justified	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		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of	B	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 feed back from public consultation with an updated Transport Assessment	

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											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.				evidence			prior to submission.	
0282-0053	Organisation	Kevin	Frazer	Essex County Council	Yes	T1	Not Stated		No	Not Stated	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. 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) 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.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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 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	

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																		Essex 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. 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 service providers during the master planning process of key development sites. EEC is reviewing the updated	

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																		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	
0282-0054	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20: 16, Page 159	Not Stated		No	Justified, Effective	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 required to undertake a vision led approach to identifying transport solutions.	Please refer to the response to Policy T5 and the Transport Assessment.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requires further clarity on specific schemes required to improve public transport services to support proposed growth	The proposed wording requires developers to provide active travel routes with high accessible specifications, which might not be possible due to site specifications on some travel route developments. CPBC proposes the following wording: New development must be designed to be inclusive, and to prioritise and	

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																		maximise opportunities for safe and convenient active travel routes supporting health and active lifestyles. Design guidance on inclusive active travel routes can be found on Active travel design resources Active Travel England This requirement should also be reflected in development proposals and master plans. The CPBC agrees that developer contributions for active travel should be appropriate and proportionate to the development taking account of the Infrastructure Delivery Plan. CPBC have updated the Plan's Transport Assessment following public consultation and will provide this for Essex	

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																		Highways to review.	
028 2-005 5	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 20: 28, Page 161	Not Stated		Yes		Work is programmed to commence the permitted short-term A127 / A130 Fairglen Interchange (short term) improvements in 2025 and will cover a two-year constriction period.	ECC require paragraph 20.28, final sentence is amended to read: Work on improvements to the Fairglen Interchange (short term) is expected to commence in 2025.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Comments that work on short term improvements to Fairglen Interchanged are scheduled in 2025	Noted and text updated	 Work on initial improvements to the Fairglen Interchange (short term) is expected to commence in due course 2025.

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028 2-005 6	Organisation	Kevin	Fraser	Essex County Council	Yes	T3	Not Stated		No	Justified, Effective	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. 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: • 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) • Accessible pedestrian infrastructure (e.g. dropped kerbs, level surfaces) – consistent with NPPF paragraph 117 a and c requiring developments to be accessible by	ECC require reference is provided in paragraph 20.33 to transport infrastructure required to support SSH, including 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. ECC require Criteria 3 is amended to read: Developments will be required to make appropriate and proportionate financial contributions towards active travel improvements within the Borough. 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.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requests the addition the recommendations of the SSHANA for the design of active travel improvements. 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. Essex Highways require to review the final Transport Assessment including the Canvey Addendum with clarification over the proposed schedule of interventions and schemes to support growth and how they have been selected.	The proposed wording requires developers to provide active travel routes with high accessible specifications, which might not be possible due to site specifications on some travel route developments. The CPBC agrees that developer contributions for active travel should be appropriate and proportionate to the development taking account of the Infrastructure Delivery Plan. CPBC have updated the Plan's Transport Assessment following public consultation and will provide this for Essex Highways to review. EEC is reviewing the updated Transport Assessment, following the comments	3. 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. ...As Castle Point has a population that is older than average, this wider definition it is

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
											sustainable transport • Public transport connectivity to health and community services – referenced in the ECC Planning with Care Guidance (2025) and Essex Local Transport Plan (LTP4) • 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. 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 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								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	important in ensuring that active travel infrastructure supports the whole community, including those who are less able, and are at risk of social isolation . Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and inclusiv

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											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. Paragraph 20.34 refers to the Transport Assessment identifying an 'Initial									e design are taken, enabling people to age well in place and reflecting the needs of different cultures , genders and disabilities. All Developments that generate significant amounts of movement may will be required to produce a Travel Plan having regard to the thresholds in Essex County Council

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											Schedule of Interventions’ including a series of potential improvements to local walking and cycling networks. This schedule was updated to reflect the 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													published guidance. 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

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											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.								and reducing car dependence. This integration supports the creation of vibrant, inclusive public spaces designed to enhance social interaction and community cohesion.

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0282-0057	Organisation	Kevin	Fraser	Essex County Council	Yes	T5	No	Does not comply with Duty to Cooperate	No	Justified	2. Justified 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 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 -	Essex Highways has reviewed the TA and the detailed report (including Appendices) is set out as Appendix 5. The issues, observations and questions have been classified into minor, moderate and severe categories. These will need to be reviewed and addressed as part of an update to the TA prior to submission of the Plan and any necessary amendments incorporated into the next iteration of the Plan.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	The Plan referred to a number of Highway Junctions operating at capacity. ECC were satisfied with the Transport Assessment Scoping 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. 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	CPBC has undertaken additional work to the Transport Assessment which will be sent to ECC to be reviewed prior to submission of the Plan. EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. 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. The Castle Point Plan is a new plan which has	

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											published post commencement of the consultation) and the Green Belt Site Assessment (with regards transport matters) in advance of the public consultation. 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: Transport Assessment • 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. • justification is required explaining why junction modelling of the key strategic junctions of Fairglen Interchange,						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.	been drawn up some 6 years after the withdrawn plan and consequently supported by new UpToDate evidence.	

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											Sadlers Farm and Rayleigh Weir has not been undertaken. • 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. • 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. Green Belt Site Assessment • 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. 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								

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											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: • 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 travel measures, and issues regarding site access (namely partly via residential routes). • 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								

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											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.								
0282-0058	Organisation	Kevin	Frasier	Essex County Council	Yes	Policy T5 - Highway Impact, paragraph 20.55, Page 166	Not Stated		No	Effective	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. However, ECC seek clarification to paragraph 20.55 which implies that all development, irrespective of scale, that generate	ECC require paragraph 20.55 is amended to read: developments that generate significant amounts of movement may be required to produce a Travel Plan having regard to the thresholds in Essex County Council published guidance.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various	B	Supports the requirement for all development which are likely to impact the transport networks to provide Transport Assessments/Statements and a Travel Plan	Accepted. CPBC agrees that any development which impacts the transport network should prepare transport assessments and travel plans to assess their impacts.	

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											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 concerns around pollution, congestion, and pressures on the existing road network.				pieces of evidence				
0282-0059	Organisation	Kevin	Fras er	Essex County Council	Yes	T6	Not Stated		No	Effective	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. 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	ECC require paragraph 20.59 is amended to read: Development should have regard to the `Schools Design Guidance (May 2025) 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.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requires that development involving schools should have regard to the School Design Guidance (May 2025)	Accepted and text amended	

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											a Travel Plan, if there are concerns around pollution, congestion, and pressures on the existing road network.								
0282-0060	Organisation	Kevin	Fraser	Essex County Council	Yes	T7	Not Stated		No	Effective	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 of the Guidance refers to sites of 1,000 homes or more, of which West Canvey is relevant. ECC seek an amendment to Criteria 3 to insert the requirement to 'have regard to' the Essex Parking Guidance prepared by EPOA.	ECC require Criteria 1 is amended to read: Proposals for development will be required to make provision for all users having regard to the Essex Parking Guidance (Part 1 and 2) prepared by EPOA. ECC require Criteria 3 is amended to read: Proposals for development will be required to have regard to the Electric Vehicle Charging Standards set out in the Essex Parking Guidance.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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 refers to development over 1000+ dwellings Require that development proposals will have regard to the Essex Parking Guidance	Accepted and text amended Accepted and text amended	1. Proposals for development will be required to make provision for all users having regard to the EPOA Essex Parking Guidance (Part 1 and 2) prepared by EPOA. 3. Proposals for development will be required to have regard to the Electric Vehicle Charging Standar

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																			ds set out in the Essex EPOA Parking Guidance prepared by EPOA.
0282-0061	Organisation	Kevin	Frasier	Essex County Council	Yes	Paragraph 20.63, Page 168	Not Stated		No	Effective	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.	ECC require paragraph 20.63 is amended to read: The Essex Planning Officers Association's (EPOA) Essex Parking Guidance (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'), where large is considered 1,000 homes or more.'	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	The Essex Planning Officers Association's (EPOA) Essex Parking Guidance Standard (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 –

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																			for Garden Communities and Large-Scale Developments (including a 'Connectivity Tool'), where large is considered 1,000 homes or more. A study was commissioned to understand and parking needs across Essex... The ECC Essex Local Transport Plan Development Management Policies sets out within its

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																			highways planning advice specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19. This standard appears appropriate for other servicing and delivery vehicles that occasionally access many developments also. Design Guidance on Street Design with

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																			respect to waste collection can be found in the Essex Design Guide-Highways Technical Manual.
028 2-006 2	Organisation	Kevin	Fras er	Essex County Council	Yes	T8	Not Stated		No	Effective	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`?	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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.	
028 2-006 3	Organisation	Kevin	Fras er	Essex County Council	Yes	Paragraph 20.69, Page 169	Not Stated		No	Effective	Further clarification should be provided that the ECC Development Management Policies are located on the ECC website under highways planning advice.	ECC require paragraph 20.69 is amended to read: The ECC Management Policies sets out within its highways planning advice specific requirements for developments that are likely	Yes	Not Stated	Yes, ECC supplied 8 additional app	B	Provide link to ECC Development Management Policies Highways Planning Advice which are located on the ECC website. This provides advice on	Accepted and text amended with link to information	

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												to be regularly accessed by HGVs at policy DM19.			endices containing various pieces of evidence		specific requirements for developments which are likely to be regularly accessed by HGVs.		
028 2-006 4	Organisation	Kevin	Fras er	Essex County Council	Yes	Paragraph 20: 71, Page 169	Not Stated		No	Effective	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 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		Yes	Not Stated	Yes, ECC supplied additional appendices containing various pieces of evidence	B	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	

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											within 25m of an adopted road.								
028 2-006 5	Organisation	Kevin	Fraser	Essex County Council	Yes	SD1	Not Stated		Yes		The refusal of new bungalows or other self-contained ground floor residential accommodation (without appropriate refuge) in Criteria 1b is welcomed 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.		Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Welcomes the restriction on new bungalows or ground floor residential accommodation on Canvey Island due to tidal flood risk. Welcomes 19m wide land buffer to existing flood defences on Canvey Island is safeguarded should any future flood defence work required.	Noted Noted	6. Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy .
028 2-006 6	Organisation	Kevin	Fraser	Essex County Council	Yes	SD1	Not Stated		No	Effective	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.	ECC require Criteria 6 is amended to read: Development proposals must ensure that habitats sites are not adversely effected and be in accordance with Policy ENV2 – Coastal & Riverside Strategy	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing	B	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.	

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															various pieces of evidence				
0282-0067	Organisation	Kevin	Fras er	Essex County Council	Yes	SD2	Not Stated		No	Effective	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. 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	ECC require Criteria 6 is amended to read: Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, 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. 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. ECC require paragraph 21.28 is amended to read: ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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 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 Accepted and text amended	Where a development proposal is for a site in an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area, a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed, and mitigation measures should

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											Sustainable Drainage Systems Guide for Essex. 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.	(CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. 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. ECC require paragraph 21.28 is amended to read: ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC’s Interactive Flood 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. 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								be satisfactorily integrated into the design and layout of the development to provide betterment to the community by reducing flood risk. 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

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												increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex. In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 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. In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 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.																provision and existing flow paths. ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding

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																			during a severe rainfall event affecting people, property or infrastructure. 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

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																			strategies should comply with the Sustainable Drainage Systems Guide for Essex. In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the 1in1 year greenfield rate for all events up to the 1in100 event

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																			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.

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																			There are as follows

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0282-0068	Organisation	Kevin	Fraser	Essex County Council	Yes	SD4	Not Stated		No	Justified, Effective	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. 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. As these policy standards are deliverable now, it is recommended that the added stipulation in Part A, paragraph 1 that ‘in exceptional circumstances, have an agreed strategy to	ECC seek Policy SD4 is amended to read: Policy SD4 – Operational Energy and Carbon (Net Zero) 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 In addition, ECC require Part A, paragraph 1 is amended to delete ‘in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation’ to be consistent with the latest EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025 in Appendix 2: All new buildings must be designed and built to be Net	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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. 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 study which states interventions provide minimal cost uplift. 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.	Accepted and text amended to reflect the recent EPOA Planning Policy Statement and the evidence base Net Zero Carbon Viability and Toolkit Study Accepted and text amended Accepted and typo corrected	A) New build development (residential and non-residential) All new buildings must shall be designed and built to be Net Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation. They must be ultra-

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											achieve net zero within five years of occupation' 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. 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 'retrofitting buildings is more disruptive, costly and time consuming than designing buildings to be net zero carbon in the first place.' (p. 181). To avoid such disruption for residents, this option to achieve the policy within five years should be removed 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.	Zero Energy and Carbon in operation at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation. They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use. 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. In the interim, ECC require the following amendments to Policy SD4, which reflect the upcoming changes to the Essex model net zero policy. Insert additional clause under Requirement 3b - New 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. Amend Requirement 4, Paragraph 1 of Policy SD4 to read:					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. Request that renewable energy must be generated on site by roof top solar PV energy on all development Typo		low energy buildings, fossil fuel free, and generate renewable energy on-site to at least match predicted annual energy use. 3. Requirement 3: Energy Use Intensity (EUI) limits The following non-residential buildings must achieve an Energy Use Intensity (EUI) of no more than the followin

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											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. 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 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 ‘All new homes and all new commercial buildings granted planning permissions to be carbon zero by 2025’ and ‘All new homes and non-domestic	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 > predicted annual energy use (kWh/m2/year)* In terms of calculation methods, the predicted annual energy use of a building / development would be expected to be calculated using predictive energy modelling, for residential buildings PHPP is often used, and for non-residential buildings often CIBSE TM54 methodology is used. The annual energy use of non-residential buildings can be predicted in a similar way to residential buildings by making assumptions based on the occupancy, typical use and size of building. Amend Part B) to read: Extensions and Conversations Conversions								g (where technically feasible) by building type or nearest equivalent: • Offices – 70 kWh/m2 GIA/year ; • Schools – 65 kWh/m2 GIA/year ; • Light Industrial – 35 kWh/m2 GIA/year ; On larger sites in exceptional circumstances this may be met on each individual phase as a site-wide

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											buildings granted planning permission to be carbon positive by 2030.’ 3. Effective 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). 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 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									residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m2 GIA/yr 4. Requirement 4: Renewable energy must be generated on-site for all new developments by whichever of the following results in the greater amount of rooftop solar PV energy (electric

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											relaxed standard for space heating in recognition of their less efficient form. 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. 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									ity) generati on: and a. Tthe amount of energy generate d in a year should match or exceed the predict e d annual energy use of the building, i.e. Renewa ble energy generati on (kWh/m 2/year) = or > predict e d annual energy use (kWh/m 2/year); or b. The amount of energy generate d in a

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											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). There is a typo in Part B) Extensions and Conversations’. Amend to read ‘Conversions’								year is: •at least 80 kWh/m2 building footprint per annum* for all building types; and •at least 120 kWh/m2 building footprint per annum for industrial buildings. B) Extensions and Conversations Conversions
0282-0069	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.41, Page 181	Not Stated		No	Effective	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.	ECC seek paragraph 21.41 is amended to read: Evidence commissioned by the ECAC demonstrates that building to the net zero carbon (in operation) standard set out in Policy GEN1 is technically feasible; financially viable and legally justified. The evidence to support this policy is set out	Yes	Not Stated	Yes, ECC supplied 8 additional appendices cont	B	Provide links to most up-to-date evidence guidance on the Essex Design Guide Net Zero Evidence Base	Accepted and link updated	

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												in the Essex Design Guide on the Net Zero Evidence page. The evidence will continue to be refreshed to help support and demonstrate the deliverability of net zero carbon development in Essex. Further information on the implementation of the policy can be viewed on the policy implementation page.			ainin g various pieces of evidence				
028 2-007 0	Organisation	Kevin	Fras er	Essex County Council	Yes	SD5	Not Stated		No	Justified, Effective	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	ECC require the policy title is amended to read: Policy SD5 – Embodied Carbon and Circular Economy ECC require the ‘placeholder policy’ Policy SD5 is replaced with the Policy GE2 set out in the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	Policy SD5 – Net Zero Carbon Development (Embodied Carbon and Circular Economy)

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											Statement Embodied Carbon and Circular Economy is recommended to form the basis for SD5. This will ensure that SD5 is supported and justified by the technical evidence established for Greater Essex and also ensure SD5 is consistent with planning policies being developed across Greater Essex.								
028 2-007 1	Organisation	Kevin	Fras er	Essex County Council	Yes	Paragraph 21. 40, 2 nd sentence, Page 181	Not Stated		No	Effective		ECC seek an amendment to read: ` was recommended by the Essex Climate Action Commission (ECAC) in July 2021.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Update evidence date to 2024	Text already states July 2024	
028 2-007 2	Organisation	Kevin	Fras er	Essex County Council	Yes	Paragraph 21. 41, 1st sentence, Page	Not Stated		No	Effective	Reference should be made to evidence base for Policy SD4 being located and updated on the Essex Design Guide	ECC require the 1st sentence is amended to read: Evidence commissioned by the 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	Yes	Not Stated	Yes, ECC supplied 8 additional appendices	B	Reference Essex Design Guide in Policy SD4	Accepted and text amended	Evidence commissioned by the Climate and Planning Unit of Essex County

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						e 181						operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide)			containing various pieces of evidence				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 ECAG demonstrates that building to the net zero carbon (in operation) standard

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																			Financially viable (Net Zero Carbon Viability Study for Essex by Three Dragons , August 2022); and the Net Zero Carbon Viability and Toolkit Study, Essex Climate Action Commission October 2025) and • Legally justified (Essex Open Legal Advice – Energy policy and Building Regulations by Estelle Dehon KC, Cornerst

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																			one Barrister s, April 2023).
028 2-007 3	Organisation	Kevin	Fraser	Essex County Council	Yes	Paragraph 21.43, Page 181	Not Stated		No	Justified, Effective	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.	ECC require paragraph 21.43 is amended to read: The outcomes of this work have fed into the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. 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. These documents should be referred to when interpreting policies SD4 and SD5 respectively.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	The outcomes of this work have fed into the EPOA Planning Policy Statement Position – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy. These documents set out the Essex-

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																			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

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																			different policy requirements in detail. This should be referred to when interpreting this policy. These documents should be referred to when interpreting policies SD4 and SD5 respectively.

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0282-0074	Organisation	Kevin	Fraser	Essex County Council	Yes	SD9	Not Stated		No	Justified, Effective	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. 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. 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. 2. Justified CPBC should prepare an up-to-date Water Cycle	ECC seek that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate. ECC recommend CPBC prepares 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. 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 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 require Criteria 1 is amended to read: All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day of	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Essex is a water stressed area, recommends a water cycle study. Recommends that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate. Recommends a water cycle study to establish water efficiency standards to be consistent with the shared standards in water efficiency developed by the water authorities, Environment Agency and Natural England and endorsed by Eater Resources East to address any water resources issues in Essex 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	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 Water Resources East as an organisation covered the East of England including Essex and did extensive research into water 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	1. All new residential development will be required to achieve a water efficiency standard of 85 ~~90~~ litres per person per day of mains supplied water/potable water ~~where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply.~~ 2. All ~~non-residenti~~

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											Study to help evidence a potential water efficiency standard of 85 l/p/d of mains supplied water/potable water per person per 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. 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. The Shared Standards for non-residential buildings are more stringent than those in Policy SD9. They provide	mains supplied water / potable water per person per day . Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. ECC require the Shared Standards in Water Efficiency for Local Plans requirements for non-residential buildings be adopted in Policy SD9, Criteria 2: 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 BREAA 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 BREAA. The applicant will be required to justify and evidence why full credits is not possible/viable for the development. ECC seek an additional Criteria be added to read: A Water Efficient Design Statement must be submitted with the application at the earliest					option to provide current building regulation water efficiency standards Recommended that the Shared Standards recommendations for water efficiency is applied to non-residential buildings. 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. 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 ECC requests a long justification paragraph	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. 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 South Essex water authorities. Water Resources East prepared evidence on water resources for the East of England	at development should achieve full credits for Wat 01 of BREAA . New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) building s aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04)

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											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 - All non-residential development should achieve full credits for Wat 01 of BREEAM 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. 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. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans	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: a) Baseline information relating to existing water use within a development site; and 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). ECC recommend the typo in the final sentence is amended to read: The fittings approach is where water fittings and appliances are selected which have a capacity up to the maximum flow rate only. ECC recommend reference is made to the Shared Standards in a new paragraph to read: 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					explaining the Shared Standards in Water Efficiency and the application of 85llpd. Accepted typo corrected Accepted. Additional justification to support the policy should be provided.	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. Accepted and text amended to include all non-residential development to achieve full credits for Wat 01 of BREEAM. CPBC accepts the requirement of a Water Efficient Design Statement to	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. 5. A Water

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											setting out its key recommendations.	to Local Planning Authorities (LPAs) on how they can secure higher water efficiency standards for new homes and commercial developments. The key recommendations are: • Water efficiency standards in new homes should aim to achieve a design standard of up to 85 litres/person/day (l/p/d). Where there is insufficient justification for 85 l/p/d, for example on viability grounds or local environmental risks, a design standard that is more stringent than building regulations should be implemented such as 90 or 95 l/p/d. • The tightest standards of water efficiency in new, extended or redeveloped non-household development should aim to achieve full credits in the BREEAM water calculator, with a minimum of 3 credits in WAT013. • All major non-household developments should include water saving measures and water reuse in their designs. • An up-to-date Water Cycle Study (WCS) should be conducted 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						demonstrate how water efficiency is met in development.	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: a) Baseline information relating to

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												the environment and support nature recovery, whilst not adversely affecting viability of development. • The LPA monitoring reports should be used to monitor the water efficiency policies to demonstrate the policies are being correctly followed and are effective.							existing water use within a development site; and b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/storm water harvesting and reuse, or greywater recycling). The fittings approach is where water fittings

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																			and appliances are selected which have a capacity up to the maximum flow rate only. The Shared Standards in Water Efficiency for Local Plans (June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment

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																			Agency and Natural England, 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.

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0282-0075	Organisation	Kevin	Fraser	Essex County Council	Yes	Chapter 22 - Monitoring Framework	Not Stated		No	Effective	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 “annual specific housing needs completions,” 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. The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 1a to track the compliance with the M4(2) standard. 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). Monitoring delivery of SSH	ECC require the replacement of the following monitoring indicator to be consistent with the indicator for SD4 Number of Whole Life Cycle Carbon Assessments submitted meeting all targets and replace with Number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets . ECC requires the following amendment to Monitoring Indicators 16 and 18 to read: Policy Hou45 – Specialist Housing Requirements Monitoring Indicator % of all new homes built to standard M4(2) ECC requires the following amendment to Monitoring Indicators 16 and 18 to read: Policy Hou45 – Specialist Housing Requirements Monitoring Indicator % of all new homes built to standard M4(3) ECC requires the following amendment to Monitoring Indicators 16 and 18 to read: Policy Hou45 – Specialist Housing Requirements Monitoring Indicator	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Requires an alternative monitoring indicator of the number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets 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 Requires that Supported and Specialist housing M4(3) to be reported within the monitoring of development 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 Include additional monitoring criteria	Accepted and monitoring indicator added CPBC agrees to add a further monitoring indicator for specialist housing requirements Accepted and text amended for monitoring to include the percentage of M4 (3) standard housing have been provided within the development Accepted and text amended to track annual delivery of specialist housing in annual monitoring reports Accepted. Additional monitoring indicators around hot takeaway planning applications included and additional text referencing INFRA3 for submission of	Number of Whole Life Cycle Carbon Assessments submitted meeting all targets Number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets Annual Specific Housing Needs Completions % of all new homes built to standard M4(3)

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											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. 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 “annual specific housing needs completions,” this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that	- the annual delivery of retirement, sheltered homes by tenure - the annual delivery of extra care units by tenure ECC requires the following amendment to Monitoring Indicators 16 and 18 to read: Policy Hou45 – Specialist Housing Requirements Monitoring Indicator - the annual delivery of residential care beds by tenure - the annual delivery of nursing care beds by tenure ECC recommend including the following indicators: - 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					to track health and wellbeing outcomes.	health impact assessments	Annual delivery of retirement, sheltered homes Annual delivery of extra care units ~~Submission of Health Impact Assessments~~ Number of Health Impact Assessments submitted in accordance with Policy Infra3 Number of Health Impact Assessment for Hot Food Takeaway Applications in

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											this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4. The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 1b to track the compliance with the M4(3) standard. 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. The Monitoring Table does not include a specific indicator to track the															accordance with Policy TC5 Number of Hot Food Takeaway Applications refused in accordance with Policy TC5

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											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 “annual specific housing needs completions,” 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. The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 2a to track the annual delivery of specialist housing by type and tenure of retirement sheltered homes. 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									

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											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. 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 “annual specific housing needs completions,” 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. The indicator for Criteria 2b should reflect the required ECC amendment									

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											to Policy Hou4, Criteria 2b to reference `nursing care beds` rather than `extra care beds`, which is consistent with national policy and ECC's statutory duties. 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. 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. ECC recommend including a monitoring indicator for Policy TC5 under Objective								

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											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								

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0282-0076	Organisation	Kevin	Fraser	Essex County Council	Yes	Policies Map	Not Stated		No	Effective, Consistent with National Policy	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 'exceptional circumstance' 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. 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. 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	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: - the General Boundary Issues, paragraph 17.9 be amended to provide commentary with regards the status of these school sites and the Green Belt - the Policies Map is amended to identify existing education sites - 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) ECC require the Mineral Safeguarding Areas are identified on the Policies Map. ECC require reference to school playing fields being defined as public open space on the Policies Map should be deleted.	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Considers that existing and potential new schools, if required 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. Request these existing school sites are allocated as education land on the policies map to strengthen the implementation of Policy Infra2.	Not accepted. 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. Accepted and Maps updated with information. Accepted and maps updated	Add Mineral Safeguarding Areas to Policy Map Remove school playing fields from open space designation Add existing 'Educational Establishments' to the Policies Map

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											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: • King John School, Benfleet; • The Deanes School, Benfleet; • Glenwood School, Benfleet; • Kents Hill Infants and Junior School, Benfleet; • Holy Family Catholic Primary School, Benfleet; • Robert Drake Primary School, Benfleet; • Canvey Skills Campus / Procat, Canvey Island; and • Cornelius Vermuyden, Canvey Island. 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						Require that Mineral Safeguarding Areas are identified on the Policies Map.		

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											accordingly. The scale of the Policies Map does not provide the certainty to ECC that these sites have been removed from the Green Belt. 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. ECC note that MSAs are not identified on the Policies Map on page 194 of the Plan. 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).										

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											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. 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.								

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0282-0077	Organisation	Kevin	Fraser	Essex County Council	Yes	Glossary	Not Stated		No	Effective	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 educational providers as being surplus to educational requirements consistent with Policy Infra2. 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.	ECC require the Glossary is amended to delete the following from the definition of Community Facilities. • Schools, Colleges and other educational facilities • Libraries and community centres • Child care centres	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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	Community Facilities: Are buildings, which enable a variety or local activity to take place including, but not limited to, the following: • Schools, Colleges and other educational facilities • Libraries and community centres

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0282-0078	Organisation	Kevin	Fraser	Essex County Council	Yes	Infrastructure Delivery Plan	Not Stated		No	Positively prepared, justified, effective, consistent with national policy	ECC has input to the baseline IDP Baseline Review (2024) and the IDP, May 2025 with regards ECC's roles and responsibilities. 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. Paragraph 19.20 of the Plan refers to the IDP establishing where new educational facilities are required based on the	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, along with any other relevant ECC roles and responsibilities. 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. The revised IDP will need to inform a review of the Whole Plan Viability Assessment which assesses the viability of the Castle Point Plan,	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	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. 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. 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), a need for change waste management approaches	CPBC have provided ECC with updated data for the cumulative assessment of primary, secondary and early years education and childcare and SEND. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. The West Canvey IDP has been provided to ECC for comment and comments provided, which require review by CPBC. 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)	

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											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 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. 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. 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	taking into account policy requirements. ECC, as the WDA seek the following amendments: Paragraph11.1.3 The WDA prepares the necessary strategies, infrastructure and contractual arrangements for the management of local authority collected waste to support the delivery of the current Waste Strategy for Essex (WSfE) . The WSfE for Essex sets the vision for the management of waste collection. The core focus of the WSfE JMWMS is to ensure the establishment of appropriate waste Paragraph 11.1.4 Paragraph 11.1.5 The WSfE recognises that waste management approaches need to change, which is expected to may necessitate new or expanded waste management infrastructure. Paragraph 11.2.5 The Essex Developers Guide to Infrastructure Contributions details the scope and range of contributions Essex County Council may seek from							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	

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											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. 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). 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: • Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and	developers and land owners to mitigate the impact of developments on waste management infrastructure. 11.4 Evidence base: • ECC Developers’ Guide to Infrastructure Contributions, ECC, 20254 Paragraph 11.5.3 This could be co-located with a WCA depot and/or RCHW facility and we are keen to explore opportunities for joint working with Castle Point Borough Council where possible.							Plan and will continue to work together to address outstanding matters as far as possible.". Accepted and inserted into IDP ECC has reviewed a draft West Canvey IDP update and provided comments along with a further education assessment to reflect the full policy requirement of 2,700 homes, rather than the 2,000 within the plan period. In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025. CPBC are preparing an update to the IDP which will be one consolidated report (including	

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											primary provision (non-defined). 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. 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);							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	

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											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 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. The Submission Plan must be supported by an up-to-date IDP that reflects								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.".	

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											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. With regards Chapter 11 – Waste Management, ECC, as the Waste Disposal Authority, would welcome the opportunity to review the IDP prior to submission. The WDA supports the following references in the IDP May 2025: • 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									

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											logistical waste infrastructure within South Essex. - 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. - 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. The WDA would like to highlight a number of amendments in advance of any update to the IDP: - references to the adopted Waste Strategy for Essex (2024) – paragraphs 11.1.3, 11.1.4, 11.4 - more positive need to change waste management approaches – paragraph 11.1.5 - update reference to the Essex Developers Guide to Infrastructure Contributions (2025) with updated advice regarding waste management –								

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											paragraphs 11.2.5, 11.4 • 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								

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0282-0079	Organisation	Kevin	Fraser	Essex County Council	Yes	SFR A	Not Stated		No	Effective	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 are located in a Critical Drainage Area; seek to provide for rainwater harvesting, where possible; reflect acceptable discharge rates; provide betterment to reduce the risk of downstream flooding; and reference the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national CIRIA SuDS Manual. Site assessment proformas have been prepared for sites that have been identified to be within Flood Zone 2 and/or Flood Zone 3 or have access routes within the Flood Zones. The proformas should refer to a 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	Reference should be made to a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance and the Essex SuDS Design Guide. ECC seek the following requirements to be required for all potential development sites: • Sites should be identified as being located within a Critical Drainage Area, and should have permeable hardstanding surfaces and the provision of rainwater harvesting, where possible. • All sites should provide source control of surface water and should consider the conveyance hierarchy as per the updated SuDS Guidance Document. • Sites in Critical Drainage Areas should discharge at the 1in1 Greenfield rate for all events up to the 1in100 event plus climate change. • Where sites have a surface water flow path consideration should be given as to what betterment can be provided to reduce the risk of downstream flooding. • Reference should be made to the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national CIRIA SuDS Manual. It provides details of the standards and guidance	Yes	Not Stated	Yes, ECC supplied 8 additional appendices containing various pieces of evidence	B	Require the SFRA to be updated to include a climate change allowance of 45% rather than 40% and to identify whether sites are located in critical drainage areas and reference Sustainable Drainage Systems Design Guide for Essex (2020). LLFA provided a list of some specific sites to review including: Richmond Ave Car Park, Knightswick Shopping Centre, Canvey Library and Barclays ,Grouts and Land to the Rear, Land above The Paddocks, Oak Road Car park, Venables Close, Canvey Job Centre, Former Admiral Jellicoe, Land to the Rear of North Avenue Essex Coachworks Former Council Offices, Corner of Little Gypps and Willow Close, Ozonia Gardens, Eastern Esplanade, Land between Station Rd and Seaview Road, Matrix House, Lionel Rd, Kushi,	The SFRA has been updated to resolve all issues aside from including a climate change allowance of 45%. This is currently ongoing. 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.". The SFRA has been updated to identify sites which are located in a critical drainage area with reference to the guidance provided in the	

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											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. The SFRA should also identify which sites are located within a Critical Drainage Area (CDA) as set out below: • 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. • 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. • Canvey Library and Barclays - refer to a climate change allowance of 45%.	on the planning, design and delivery of attractive and high-quality sustainable drainage systems (SuDS) schemes providing multiple benefits to the environment and community.					Furtherwick Road Require the upper end allowance of 45% for peak rainfall intensity to be used within the Level 2 SFRA 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.	Sustainable Drainage Systems Design Guide for Essex (2020) The Level 2 SFRA has been updated with the 45% peak rainfall intensity, The Level 2 SFRA has been updated to consider sites within critical drainage areas and for the control surface water sources to be considered.	

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											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. • 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. • 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. • 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. • 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.								

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											• Canvey Job Centre - refer to a climate change allowance of 45%. • 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. • 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. • 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. • Essex Coachworks - refer to a climate change allowance of 45%. • Former Council Offices, Long Road - refer to a climate change allowance of 45%. • 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.								

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											• 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. • 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. • 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. • 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. 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								

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											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. 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										

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											with the national CIRIA SuDS Manual.								
0282-0080	Organisation	Kevin	Fraser	Essex County Council	Yes	For word	Not Stated		Not Stated		ECC would also like to take the opportunity to re-iterate the agreed joint position with Castle Point Borough Council (CPBC) with regards to the North West Thundersley Development Option which is set out in the Statement of Common Ground (SOCG). Paragraphs 5.1 and 5.2 of the SOCG, with regards the		Not Stated		Yes, ECC supplied 8 additional appendices containin	B	ECC refers to potential development in NW Thundersley. ECC acknowledge that CP's housing need is not dependent on NW Thundersley being developed, and note it would require a co-ordinated process to bring the site	CPBC has not allocated any sites in NW Thundersley but notes should any site be brought forward in the future, it would include input from neighbouring councils	

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											non-allocation of the site in this Plan and the longer term strategic planning approach. “Both CPBC and ECC agree that any potential growth in North West Thundersley 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. 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				g various pieces of evidence		forward which would include input from neighbouring councils		

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											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.” Finally, in the context of a Spatial Development Strategy (SDS), we note, the Greater Essex Mayoral role will involve setting a strategic framework for investment and development, including housing and employment growth. The SDS will provide clarity on the quantity and strategic locations for growth in the longer term looking forward 30 years to support and guide future Unitary Authority Local Plans, which could include areas where there are current constraints to overcome, including North West Thundersley.								
0057-0001	Organisation	James	Lawson	Essex Police	Yes	Whole Plan	Yes	1. Essex Police (EP) submitted evidence to the Castle Point Plan 2023-2043 (Issues & Options (Regulation 18) consultation in September 2024, outlining EP’s role as an essential social infrastructure provider with a key role to play in providing for community safety, cohesion and policing in the Borough to achieve sustainable new	Yes				Not Stated		Yes, Neighbourhood Police Update	A	Essex Police – Policy Recognition for Developer Funded Infrastructure EP is satisfied that sufficient recognition is now included in the proposed policies and text of the draft local plan, to ensure that developer funded	Comments noted	N

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								communities. 2. EP's evidence also outlined the requirement for developer funded police infrastructure/ facilities to mitigate and manage the impacts arising on its service capacity from planned housing and population growth. 3. EP is satisfied that sufficient recognition is now included in the proposed policies and text of the draft local plan, to ensure that developer funded police infrastructure/ facilities can be secured from residential development either via planning obligations (i.e. Section 106 Agreements) or via CIL at such a time as a levy may be introduced. 4. EP welcomes the approach and raises no 'soundness objections' to the draft Plan as currently drafted.								police infrastructure/ facilities can be secured from residential development either via planning obligations (i.e. Section 106 Agreements) or via CIL at such a time as a levy may be introduced. EP welcomes the approach and raises no 'soundness objections' to the draft Plan as currently drafted. Infrastructure Delivery Plan – Infrastructure Assessment (May 2025)			
0057-0002	Organisation	Jam es	Law son	Essex Police	Yes	IDP	Yes	5. Essex Police submitted evidence to inform the Borough's housing growth infrastructure scoping process - at the stakeholder consultation stage of the Castle Point Infrastructure Delivery Plan (IDP) in February 2025. 6. EP's evidence assessed the increased demand arising	Yes				No t Stated		Yes, Neighbourhood Police Update	A	EP is satisfied that that sufficient recognition for developer funded police infrastructure/ facilities is now included within the IDP. EP welcomes the approach and raises no 'soundness	Comments noted	N

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								on its service capacity from planned housing and population growth, and set out the scope and level of developer funded infrastructure/ facilities required to mitigate and manage the impacts from housing/ population growth. 7. EP is satisfied that that sufficient recognition for developer funded police infrastructure/ facilities is now included within the IDP. 8. EP welcomes the approach and raises no ‘soundness objections’ to the Infrastructure Delivery Plan Infrastructure Assessment (IDP evidence base) as currently drafted. 9. Finally, Annex 1 and Annex 2 below, provide a number of clarifications to update the EP evidence base, along with minor changes to assist with the update of the IDP.									objections’ to the Infrastructure Delivery Plan Infrastructure Assessment (IDP evidence base) as currently drafted. Finally, Annex 1 and Annex 2 below, provide a number of clarifications to update the EP evidence base, along with minor changes to assist with the update of the IDP.		
0336-0001	Organisation	Caroline	Peters	Essex Police		Vision	Not Stated	Essex Police acknowledges the Vision and objectives for Castle point and is encouraged that ‘Safe home and street’ has been included. It is essential that crime (and the perception of,) Anti-Social Behaviour (ASB) and safety is taken into consideration when creating new and existing	Not Stated							A	Supports the vision	Support noted.	N

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								communities, this will also support health and wellbeing and sustainable outcomes. Working alongside the DOCO will support the vision for Castle Point and support the creating safe and inclusive places for all.											
0336-0002	Organisation	Caroline	Peters	Essex Police		SP2	Not Stated	Within Paragraph 3 it is stated that 'new development contribute(s) positively towards the quality of the Borough'. The DOCO notes the need to make effective use of Urban land and agrees development should contribute positively. It is advised there is liaison with Essex Police to ensure all new development is designed to be safe and secure which will support this policy and National Guidance.	Not Stated		The DOCO notes paragraph 6.27 which advises the Council will work alongside Design Teams to ensure development is appropriately designed. We would strongly advocate that the DOCO is included in this process to ensure new development is being designed with the considerations towards crime and anti-social behaviour (ASB). Furthermore, academia identifies that the impact (and perception of) crime can have a negative effect on the health and wellbeing of communities, which aligns to longer term sustainability goals.					A	advised there is liaison with Essex Police to ensure all new development is designed to be safe and secure which will support this policy and National Guidance.	Applications will have to comply with policy D1 which encourages design out crime	N
0336-0003	Organisation	Caroline	Peters	Essex Police		SP3	Not Stated	The DOCO was invited to attend the Castle Point Regulation 19 Draft Plan Stakeholder Workshop and further to this meeting recommends that the DOCO is contacted (ideally at the pre-planning stage) regarding future Master Plans, this will enable effective partnership working and ensure all new	Not Stated			To evidence requirements within National Policy aligned to safety and security, and to substantiate commitments within Design and Access Statements, Health and Wellbeing Strategies etc, it is recommended Secured by Design (SBD) accreditation is considered. Please note that the DOCO would welcome the inclusion of				A	Ensure alignment with national policy with regards to safety and security	Policy D1 requires opportunities for design out crime to be taken.	N

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d	
								development are safe for all future users.				Planning Conditions to not only secure SBD accreditation but where appropriate condition DOCO / Essex Police Engagement.								
0336-0004	Organisat ion	Car olin e	Pete rs	Esse x Polic e		C1	Not Sta ted	The DOCO acknowledges the proposed regeneration and investment into Canvey Island Town Centre. Traditional town centres are known to have a higher rate of crime and ASB due to the mixed uses (inclusive of Nighttime Economy) and volume of people. It is strongly advised that the DOCO is involved in future meetings to discuss the regeneration of the Town Centre; this will help with the reduction of crime and ASB and having a positive effect on the community. Additionally, the DOCO can aid with the future refurbishments and enhancements proposed within the regeneration of the Knightswick Centre.	No t St ate d							A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N	
0336-0005	Organisat ion	Car olin e	Pete rs	Esse x Polic e		C2	Not Sta ted	It is referenced there will be a Master Plan prepared by the Council which ‘will set out a clear vision and objectives for the area’. When preparing the master plan, we would advocate that in addition to the mitigation of crime and ASB, that developers incorporate measures to reduce the opportunities for ‘Violence against Women and Young Girls’ across their proposals. As part of	No t St ate d								A	When preparing the master plan, we would advocate that in addition to the mitigation of crime and ASB, that developers incorporate measures to reduce the opportunities for ‘Violence against Women and Young Girls’ across their proposals. As part	This site will be assessed under policy D1 which includes opportunities for design out crime to be taken	N

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								the consultation process, engagement with the DOCO will ensure that the Sea Front area is safe and inclusive all at all times (this will consider the Nighttime Economy).									of the consultation process, engagement with the DOCO will ensure that the Sea Front area is safe and inclusive all at all times (this will consider the Nighttime Economy).		
0336-0006	Organisation	Caroline	Peters	Essex Police		C3	Not Stated	It is noted that future development within the Port will be addressed under Permitted Development. The DOCO acknowledges the parameters of such applications but would welcome consultation in relation to the design and layout, cognisant of sustainability requirements for the public access route and proposed local cycling and walking routes.	Not Stated							A	It is noted that future development within the Port will be addressed under Permitted Development. The DOCO acknowledges the parameters of such applications but would welcome consultation in relation to the design and layout, cognisant of sustainability requirements for the public access route and proposed local cycling and walking routes.	Within the parameters of the applications submitted where possible Essex police will be consulted.	N
0336-0007	Organisation	Caroline	Peters	Essex Police		C4	Not Stated	The DOCO acknowledges the site will provide approximately '2,700 new homes, employment, associated community facilities and open space provision' and that this development will be subject to a Master Plan, (specifically regarding the improvement to public realm). It is recommended	Not Stated							A	It is recommended that the DOCO is consulted during the preparation for the Master Plan.	This site will be assessed under policy D1 which includes opportunities for design out crime to be taken.	N

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								that the DOCO is consulted during the preparation for the Master Plan.											
0336-0008	Organisation	Caroline	Peters	Essex Police		C5	Not Stated	The DOCO notes the requirement to improve access to, from and within Canvey Island. It is essential that emergency vehicles can gain rapid access to any incident occurring across Canvey Island and surrounding neighbourhoods. It is recommended that there is liaison with the Essex Road Policing Team who can support the design process when considering future road infrastructure.	Not Stated							A	It is essential that emergency vehicles can gain rapid access to any incident occurring across Canvey Island and surrounding neighbourhoods. It is recommended that there is liaison with the Essex Road Policing Team who can support the design process when considering future road infrastructure.	Any changes to access will be subject to consultation from Essex highways.	N
0336-0009	Organisation	Caroline	Peters	Essex Police		C8	Not Stated	It is advised there is engagement with the DOCO when designing residential Park Homes. Due to the locations of park homes and the structure of the buildings they can be difficult to secure, it is however advised they are designed to be a safe and secure as possible to prevent crime and antisocial behaviour. At the appropriate time within the planning process, we would strongly advocate the use of Planning Condition to secure engagement with the DOCO in relation to the application of CPTED principles.	Not Stated							A	It is advised there is engagement with the DOCO when designing residential Park Homes. At the appropriate time within the planning process, we would strongly advocate the use of Planning Condition to secure engagement with the DOCO in relation to the application of CPTED principles.	As stated at paragraph 8.66 often these sites have come forward under existing planning consents but where possible Essex police will be consulted	N

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0336-0010	Organisation	Caroline	Peters	Essex Police		B1	Not Stated	The DOCO recognises the potential for the redevelopment of the Town Centres and notes there is a requirement for mixed used development. Mixed used buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Not Stated			The DOCO would like to bring to your attention, the Home Office strategy of reducing Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new and adapting public realm and green spaces (inclusive of walking, cycling and play areas,) that consideration should be given to environmental design so that women and girls feel included and comfortable using the spaces. "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault, or harassment. They also feel uncomfortable, unwelcomed, and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for women and girls: Safer Parks Executive Summary (greenflagaward.org)				A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N

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0336-0011	Organisation	Caroline	Peters	Essex Police		B2	Not Stated	The DOCO recognises the potential for the redevelopment of the Town Centres and notes there is a requirement for mixed used development. Mixed used buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Not Stated			The DOCO would like to bring to your attention, the Home Office strategy of reducing Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new and adapting public realm and green spaces (inclusive of walking, cycling and play areas,) that consideration should be given to environmental design so that women and girls feel included and comfortable using the spaces. "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault, or harassment. They also feel uncomfortable, unwelcomed, and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for women and girls: Safer Parks Executive Summary (greenflagaward.org)				A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N

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0336-0012	Organisation	Caroline	Peters	Essex Police		B3	Not Stated	The DOCO recognises the potential for the redevelopment of the Town Centres and notes there is a requirement for mixed used development. Mixed used buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.				The DOCO would like to bring to your attention, the Home Office strategy of reducing Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new and adapting public realm and green spaces (inclusive of walking, cycling and play areas,) that consideration should be given to environmental design so that women and girls feel included and comfortable using the spaces. "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault, or harassment. They also feel uncomfortable, unwelcomed, and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for women and girls: Safer Parks Executive Summary (greenflagaward.org)				A	Mixed use buildings can be difficult to secure if safety and security are not recognised in the early designed stages. At the appropriate stage it is advised there is liaison with the DOCO to ensure safety of residents is considered and CPTED principles have been applied.	Policy D1 requires opportunities for design out crime to be taken.	N
0336-0013	Organisation	Caroline	Peters	Essex Police		B8	Not Stated	The DOCO notes the redevelopment of the Manor Trading Estate, and the requirement to optimise								A	Welcome the opportunity to influence the design of Urban	Consultation with the police alongside compliance with	N

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								urban land use and improve the quality of the urban environment and public realm. Thought should be given to the current location and other parcels of Urban Land to identify what measures could be required from a safety and security perspective. Further to the Regulation 19 Draft Plan Stakeholder Workshop, we would welcome the opportunity to influence the design of Urban Land. Such engagement will help identify features within the built environment that be designed out and assist in the creation of further planning objectives on this matter.									Land. Engagement will help identify features within the built environment that be designed out and assist in the creation of further planning objectives on this matter.	policy D1 will be implemented.	
0336-0014	Organisation	Caroline	Peters	Essex Police		B9	Not Stated	It is recognised that the playing fields have been identified on the Master Plan as multi-functional green. It is essential all green space is designed to be safe and inclusive for all to use and enjoy. It is advised community facilities are designed to be safe and inclusive, this will support in the prevention of crime and ASB, while allowing all users to feel included within the proposed facilities				The DOCO would also like to draw your attention to the 'Make Space For Girls' campaign, (www.makespaceforgirls.co.uk/about-us); this initiative aims to incorporate the observations and opinions of teenage girls into the design and development of new and old play spaces. This is to ensure that spaces are inclusive and safe for female users. "We are working on a range of projects which improve parks and other outdoor spaces in order to support opportunities for teenage girls and improve their mental and physical well-				A	It is advised community facilities are designed to be safe and inclusive, this will support in the prevention of crime and ASB, while allowing all users to feel included within the proposed facilities	This site will be assessed under policy D1 which includes opportunities for design out crime to be taken	N

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												being and their access to public space. We collaborate with a wide range of institutions, including universities, health trusts, councils, and developers to create change.”							
0336-0015	Organisation	Caroline	Peters	Essex Police		Infra3	Not Stated	Constructing well designed developments, buildings and places that promote both sustainable communities and health and wellbeing is an objective that Essex Police widely supports. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, healthy, cohesive, accessible, vibrant, and participatory communities. 'The relationship between an area's health and crime levels is complex. On one hand, living in areas with high levels of crime can affect people's health negatively. In addition to the direct health effects of being the victim of violent crime, fear of crime can also have an indirect detrimental impact on health. Research shows that fear of crime results in people exercising less, as well as reducing how often people socialise, resulting in poorer mental and physical health.'								A	Support for INFRA3.	Support noted	N

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0336-0016	Organisation	Caroline	Peters	Essex Police		T1	Not Stated	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.								A	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.	Essex highways are a statutory consultee and will be consulted in receipt of any application submitted	N
0336-0017	Organisation	Caroline	Peters	Essex Police		T2	Not Stated	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.								A	It is advised that there is engagement with Essex Police Roads Policing Team when designing transport network improvements. It is essential that emergency vehicles can gain rapid access to any incident occurring within the community and surrounding neighbourhoods.	Essex highways are a statutory consultee and will be consulted in receipt of any application submitted	N

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0269-0001	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV2	Yes	Policy ENV2: Coastal & Riverside Strategy While we strongly support the policy's strategic objectives and multi-functional approach to coastal management, we object to Policy ENV2 in its current form as it fails to meet the tests of soundness required for examination. Fundamental gaps in implementation render the policy ineffective for protecting Castle Point's internationally important coastal habitats. 2	No	Effectiveness	The policy demonstrates a strong strategic vision and appropriately integrates with regional frameworks including the Thames Estuary 2100 Plan, the Essex Local Nature Recovery Strategy, and South Essex Estuary Park initiative. However, we have concerns that Policy ENV2 fails the effectiveness test due to critical implementation gaps. The policy's effectiveness depends entirely on preparation of a Riverside Strategy, yet no timeline, governance arrangements, or resource commitments are provided for this fundamental delivery mechanism. This creates a policy vacuum that could persist for some considerable time while leaving internationally important coastal habitats without adequate protection. During the potentially lengthy strategy preparation period, development proposals affecting coastal areas will lack clear guidance on biodiversity protection requirements. This is particularly problematic given that Castle Point's coastal areas contain Special Protection Areas and Special Areas of Conservation supporting nationally significant	Suggested Amendments To address these fundamental concerns, we consider three critical amendments essential for the policy to be found sound. First, the policy should include a clear and binding timeline for Riverside Strategy completion, for example completion within two years of plan adoption, supported by defined partnership arrangements and resource commitments. Second, the policy should provide interim guidance for determining applications affecting coastal areas prior to strategy completion. This should include specific criteria for protecting coastal habitats, contributing to LNRS strategic opportunities, and ensuring flood defence improvements deliver biodiversity benefits alongside flood protection. Third, the policy should explicitly reference the specific coastal habitat types requiring protection, including coastal grazing marsh, mudflats, saltmarsh, and associated terrestrial habitats,	Not Stated		No	A	Essex Wildlife Trust comment on the following policies, including recommendations for mods. Policy ENV2: Coastal & Riverside Strategy Strongly support the policy's strategic objectives and multi-functional approach to coastal management, we object to Policy ENV2 in its current form as it fails to meet the tests of soundness required for examination. Fundamental gaps in implementation render the policy ineffective for protecting Castle Point's internationally important coastal habitats. Concerns that Policy ENV2 fails the effectiveness test due to critical implementation gaps. The policy's effectiveness depends entirely on preparation of a Riverside Strategy, yet no timeline,	Policy ENV2 - Comments noted, some of the concerns are already covered. Priority habitats are already protected by Policy ENV3. Part 6 of Policy ENV2 already covers much of the expressed concerns ' <i>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.</i> ' However, the policy and text may benefit from more clarity and cross-references - see proposed mods.	Y Policy ENV2 – Coastal & Riverside Strategy 1. Working with the Environment Agency, ECC Lead Local Flood Authority, neighbouring authorities, the community and other relevant stakeholders the Council will prepare a Riverside Strategy. The Riverside Strategy will: a. Looking

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											populations of wintering waterfowl and breeding birds. The policy lacks sufficient detail on how coastal habitat enhancement will be achieved and fails to acknowledge specific habitat types requiring protection. Castle Point's coastal grazing marshes, mudflats, and saltmarsh habitats are critical for wildlife and face increasing pressure from sea level rise, increasing recreational disturbance and development. These internationally important habitats need explicit protection measures that operate immediately rather than awaiting future strategy development. The policy also fails to establish clear partnership governance arrangements with Natural England, the Environment Agency and neighbouring authorities, despite acknowledging their essential role. Without defined roles, responsibilities, and resource commitments, there is no certainty that the Riverside Strategy will be delivered within any reasonable timeframe.						governance arrangements, or resource commitments are provided for this fundamental delivery mechanism. This creates a policy vacuum that could persist for some considerable time while leaving internationally important coastal habitats without adequate protection. During the potentially lengthy strategy preparation period, development proposals affecting coastal areas will lack clear guidance on biodiversity protection requirements. This is particularly problematic given that Castle Point's coastal areas contain Special Protection Areas and Special Areas of Conservation supporting nationally significant populations of wintering waterfowl and breeding birds. The policy lacks		across administrative boundaries, covering the Bowers Marshes , Canvey Island and Hadleigh Marshes Policy Unit areas as set out in the Thames Estuary 2100 Plan; b. Allow for and plan for improvements to and management of the flood defences; c. Improve access to and enjoyment of the coast,

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																	sufficient detail on how coastal habitat enhancement will be achieved and fails to acknowledge specific habitat types requiring protection. Castle Point's coastal grazing marshes, mudflats, and saltmarsh habitats are critical for wildlife and face increasing pressure from sea level rise, increasing recreational disturbance and development. These internationally important habitats need explicit protection measures that operate immediately rather than awaiting future strategy development. The policy also fails to establish clear partnership governance arrangements with Natural England, the Environment Agency and neighbouring authorities, despite acknowledging their essential role.		creating cross boundary links where possible ; d. Enhance the cultural and social value of the coastal areas; and e. Enhance the ecological networks along the coast and coastal habitats . 2. Proposals will not be supported where they conflict with the aims of the Riversid

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																	Without defined roles, responsibilities, and resource commitments, there is no certainty that the Riverside Strategy will be delivered within any reasonable timeframe. Suggested Amendments: To address these fundamental concerns, we consider three critical amendments essential for the policy to be found sound. First, the policy should include a clear and binding timeline for Riverside Strategy completion, for example completion within two years of plan adoption, supported by defined partnership arrangements and resource commitments. Second, the policy should provide interim guidance for determining applications affecting coastal areas prior to strategy		e Strategy . 3. Proposals which deliver the multi-functional green and blue infrastructure recommendations of the South Essex Estuary Park (SEE Park) will be supported. 4. Be subject to a Habitats Regulations Assessment in order to demonstrate no adverse effects on site integrity. 5. Development

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																	completion. This should include specific criteria for protecting coastal habitats, contributing to LNRS strategic opportunities, and ensuring flood defence improvements deliver biodiversity benefits alongside flood protection. Third, the policy should explicitly reference the specific coastal habitat types requiring protection, including coastal grazing marsh, mudflats, saltmarsh, and associated terrestrial habitats, providing immediate clarity on biodiversity priorities while the detailed strategy is being developed.		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). 6. Development proposals must ensure areas that are identified as an Area of Particular Importance for

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																			Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS), and priority habitats such as coastal floodplains in grazing marsh, mudflats and coastal saltmarsh are protected and where possible enhanced. 7. Proposals for flood defence improvements should seek to deliver biodiversity

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																			benefits alongside flood protection. 18.15 It is important for future generations that new development does not hamper the delivery of the Riverside Strategy , and to this end, it will be a material planning consideration when determining applications within the vicinity of the coast. Coastal and riversid

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																			These areas are subject to environmental protection under elements 3-7 of policy ENV2, as well as other policies within the plan, which provide assurance of their appropriate consideration and protection on the interim period prior to the publication of the Riverside Strategy.

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0269-0002	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV3	Yes	Policy ENV3: Securing Nature Recovery and Biodiversity Net Gain We conditionally support Policy ENV3, recognising its strong ambitions for biodiversity protection and enhancement in Castle Point. The policy demonstrates good alignment with national policy requirements and exceeds minimum biodiversity net gain standards through its 20% requirement on greenfield sites. The policy appropriately recognises that the statutory framework under the Environment Act 2021 provides the implementation mechanisms for biodiversity net gain, including automatic conditions, enforcement powers, and 30-year maintenance requirements. The policy meets the tests for being positively prepared and consistent with national policy. We particularly welcome the integration with Essex-wide strategies including the Local Nature Recovery Strategy and the Essex Coast Recreational Avoidance and Mitigation Strategy. The policy appropriately recognises the biodiversity hierarchy and implements Habitats	Yes		The policy demonstrates good justification for its higher biodiversity net gain requirements, with clear rationale based on viability testing and appropriate differentiation between brownfield and greenfield sites. We strongly support the ambitious approach of requiring 20% biodiversity net gain on greenfield sites, which reflects Castle Point's important role in the wider Essex nature recovery network.	However, we have concerns regarding the policy's long-term effectiveness in three key areas that require strengthening to ensure the policy fully meets the effectiveness test for soundness. Key Areas Requiring Amendment We have identified three critical improvements necessary for the policy to be fully effective. First, the identification of only two preferred sites for off-site biodiversity net gain provision may be insufficient to meet likely demand over the plan period. Additional strategic sites should be identified to prevent delivery bottlenecks that could undermine the policy's objectives. The policy should include a commitment to regularly review and expand the list of preferred off-site sites based on demand and availability. Second, the policy lacks clear criteria for selecting future off-site biodiversity net gain sites. Establishing transparent selection criteria would provide certainty for developers and landowners while ensuring sites contribute effectively to the Local Nature Recovery Strategy objectives. These criteria should prioritise sites that will enhance ecological connectivity, are capable of supporting	Not Stated		No	A	Conditionally support ENV3. The policy demonstrates good alignment with national policy requirements and recognises the statutory framework under the Environment Act 2021 provides the implementation mechanisms for biodiversity net gain, including automatic conditions, enforcement powers, and 30-year maintenance requirements. The policy meets the tests for being positively prepared and consistent with national policy. We particularly welcome the integration with Essex-wide strategies including the Local Nature Recovery Strategy and the Essex Coast Recreational Avoidance and Mitigation Strategy. The policy appropriately recognises the biodiversity hierarchy and	Mods proposed to address the concerns	Y18.31 The Castle Point Green and Blue Infrastructure Strategy and Open Space Assessment have both considered a number of sites across Castle Point for their potential suitability for off-site biodiversity net gain. Of those sites that have been assessed as having significant potential

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								Regulations requirements, while incorporating relevant statutory duties under the Natural Environment and Rural Communities Act 2006 and Wildlife and Countryside Act 1981.				priority habitats and species, and will contribute to landscape-scale nature recovery. Third, while the policy references the Essex Local Nature Recovery Strategy, it could strengthen the integration between biodiversity net gain delivery and LNRS implementation. The policy should explicitly encourage biodiversity net gain provision in LNRS opportunity areas and consider how strategic significance multipliers could incentivise habitat creation in locations that maximise benefits for nature recovery. Recommended Policy Additions To address these concerns, we recommend adding text to commit the Council to maintaining an up-to-date list of preferred off-site biodiversity net gain sites, with regular reviews to ensure adequate provision. The policy should include criteria for site selection focusing on ecological connectivity, priority habitat creation, and alignment with Local Nature Recovery Strategy objectives. Additionally, the policy should explicitly encourage off-site biodiversity net gain provision within LNRS opportunity areas and consider how the strategic significance multiplier can be used to direct habitat					implements Habitats Regulations requirements, while incorporating relevant statutory duties under the Natural Environment and Rural Communities Act 2006 and Wildlife and Countryside Act 1981. 3 The policy demonstrates good justification for its higher biodiversity net gain requirements, with clear rationale based on viability testing and appropriate differentiation between brownfield and greenfield sites. We strongly support the ambitious approach of requiring 20% biodiversity net gain on greenfield sites, which reflects Castle Point's important role in the wider Essex nature recovery network. However, we have concerns regarding		l biodiversity enhancement and are either owned by the Council or have been promoted for inclusion in the Plan for biodiversity, are identified as the first tranche of preferred offsite biodiversity net gain sites. The need for further off-site biodiversity net gain sites will be kept under review and the preferred

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												creation to locations that maximise landscape-scale conservation benefits. Protected Species Considerations We welcome the policy's recognition of protected species but recommend strengthening provisions for badger protection. Castle Point has a notable badger population, and development pressure increasingly creates conflicts between badgers and residents when animals access gardens and cause damage through foraging activities. This issue is exacerbated by new developments encroaching on traditional badger territories. We developed a Badger Protection Plan in collaboration with Castle Point Borough Council in 2020, which provides comprehensive guidance for addressing these challenges. The policy should reference this guidance and require badger protection plans for developments within 1km of known badger setts. Key mitigation measures should include maintaining habitat connectivity through wildlife corridors, implementing appropriate fencing specifications to guide badger movement away from vulnerable areas, and ensuring development design minimises habitat					the policy's long-term effectiveness in three key areas that require strengthening to ensure the policy fully meets the effectiveness test for soundness. ENV3 - Key Areas Requiring Amendment We have identified three critical improvements necessary for the policy to be fully effective. First, the identification of only two preferred sites for off-site biodiversity net gain provision may be insufficient to meet likely demand over the plan period. Additional strategic sites should be identified to prevent delivery bottlenecks that could undermine the policy's objectives. The policy should include a commitment to regularly review and expand the list of preferred off-site sites based on demand and availability.		d list expanded further, in response to demand and availability.

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												fragmentation. Effective badger mitigation requires early assessment of badger activity, coordination with neighbouring developments to avoid cumulative impacts, and long-term monitoring to ensure protection measures remain effective. The policy could be strengthened by explicitly requiring compliance with the Essex Wildlife Trust Badger Protection Plan guidance where badger territories may be affected by development.					Second, the policy lacks clear criteria for selecting future off-site biodiversity net gain sites. Establishing transparent selection criteria would provide certainty for developers and landowners while ensuring sites contribute effectively to the Local Nature Recovery Strategy objectives. These criteria should prioritise sites that will enhance ecological connectivity, are capable of supporting priority habitats and species, and will contribute to landscape-scale nature recovery. Third, while the policy references the Essex Local Nature Recovery Strategy, it could strengthen the integration between biodiversity net gain delivery and LNRS implementation.		

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																	The policy should explicitly encourage biodiversity net gain provision in LNRS opportunity areas and consider how strategic significance multipliers could incentivise habitat creation in locations that maximise benefits for nature recovery. Recommended Policy Additions To address these concerns, we recommend adding text to commit the Council to maintaining an up-to-date list of preferred off-site biodiversity net gain sites, with regular reviews to ensure adequate provision. The policy should include criteria for site selection focusing on ecological connectivity, priority habitat creation, and alignment with Local Nature Recovery Strategy objectives.		

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																	Additionally, the policy should explicitly encourage off-site biodiversity net gain provision within LNRS opportunity areas and consider how the strategic significance multiplier can be used to direct habitat creation to locations that maximise landscape-scale conservation benefits. Protected Species Considerations We welcome the policy's recognition of protected species but recommend strengthening provisions for badger protection. Castle Point has a notable badger population, and development pressure increasingly creates conflicts between badgers and residents when animals access gardens and cause damage through foraging activities. This issue is exacerbated by		

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																	new developments encroaching on traditional badger territories. We developed a Badger Protection Plan in collaboration with Castle Point Borough Council in 2020, which provides comprehensive guidance for addressing these challenges. The policy should reference this guidance and require badger protection plans for developments within 1km of known badger setts. Key mitigation measures should include maintaining habitat connectivity through wildlife corridors, implementing appropriate fencing specifications to guide badger movement away from vulnerable areas, and ensuring development design minimises habitat fragmentation. Effective badger		

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																	mitigation requires early assessment of badger activity, coordination with neighbouring developments to avoid cumulative impacts, and long-term monitoring to ensure protection measures remain effective. The policy could be strengthened by explicitly requiring compliance with the Essex Wildlife Trust Badger Protection Plan guidance where badger territories may be affected by development.		

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0269-0003	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV4	Yes	Policy ENV4: Local Wildlife and Geological Sites While we support several elements of the policy, we must formally object to Policy ENV4 as unsound due to fundamental concerns with paragraph 4. We support paragraphs 1-3 of Policy ENV4, which provide an appropriate framework for the conservation and enhancement of locally designated sites. These paragraphs demonstrate a clear commitment to active conservation and enhancement of both biodiversity and geodiversity interests, supported by the comprehensive LoWS Review (2023-2024) and formal endorsement from the Essex Local Nature Partnership. We also welcome paragraphs 5-6, which properly integrate the policy with Essex Local Nature Recovery Strategy (LNRS) habitat priority measures and Areas of Particular Importance for Biodiversity. This strategic connectivity is essential for successful nature recovery and demonstrates forward-thinking planning that aligns with national biodiversity objectives.	No	Justified, Effective	However, we strongly object to Policy ENV4 as unsound due to paragraph 4, which permits development on Local Wildlife Sites with mitigation. This provision fails multiple tests of soundness and undermines the policy's overall effectiveness. Failure of the Justified Test Paragraph 4 contains a fundamental logical contradiction. Local Wildlife Sites are designated specifically because they are significant biodiversity assets that merit protection. If these sites could be simply replaced through mitigation measures, they would not meet the criteria for designation in the first place. The policy therefore undermines its own rationale by allowing development with mitigation on sites that have been scientifically identified as biodiversity assets of county-level importance. Inconsistency with National Policy The provision directly conflicts with the National Planning Policy Framework, particularly paragraph 179, which requires planning policies to "safeguard components of local wildlife-rich habitats." Safeguarding means protection and	Recommended Modification To address these fundamental concerns, we recommend replacing paragraph 4 with the following: "Development proposals that would result in the loss of or harm to a Local Wildlife Site, Local Geological Site, or Potential Local Wildlife Site will be refused unless there are exceptional reasons to justify development in that location. Proposals must demonstrate that every reasonable effort has been taken to minimise harm through avoidance, and any residual harm must be fully mitigated." This modification would align the policy with the scientific basis for site designation, support statutory biodiversity duties, protect core components of the nature recovery network, and provide policy coherence while maintaining appropriate flexibility for truly exceptional circumstances.	Not Stated		No	A	Formally object to Policy ENV4 as unsound due to fundamental concerns with paragraph 4. But support several elements of the policy. We support paragraphs 1-3 of Policy ENV4, which provide an appropriate framework for the conservation and enhancement of locally designated sites. These paragraphs demonstrate a clear commitment to active conservation and enhancement of both biodiversity and geodiversity interests, supported by the comprehensive LoWS Review (2023-2024) and formal endorsement from the Essex Local Nature Partnership. We also welcome paragraphs 5-6, which properly integrate the policy with Essex Local Nature Recovery	Comments noted. Agree to proposed mod.	Y ENV4 - Replace paragraph 4 with the following: ENV4 - Replace paragraph 4 with the following: "Development proposals that would result in the loss of or harm to a Local Wildlife Site, Local Geological Site, or Potential Local Wildlife Site will ~~not be permitted~~ be refused unless it can be clearly demonstrated

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											preservation, not managing decline through mitigation. Additionally, the policy conflicts with the Government's 30 by 30 commitment, which requires protecting 30% of land by 2030, and undermines the very sites identified as core components of the nature recovery network in the Essex LNRS. Effectiveness Concerns Paragraph 4 cannot effectively deliver biodiversity conservation or nature recovery objectives. The subjective standard of "every reasonable effort" provides no measurable criteria for enforcement, while the concept of "full mitigation" is scientifically questionable for habitats of high and very high distinctiveness. The policy creates a fundamental contradiction with Policy ENV3's biodiversity net gain requirements and fails to address the cumulative impact of individual site losses on landscape-scale ecological functions. Statutory Duty Implications Paragraph 4 raises concerns regarding the Council's statutory biodiversity duty under Section 40 of the Natural Environment and Rural Communities Act 2006. By permitting development on designated biodiversity						Strategy (LNRS) habitat priority measures and Areas of Particular Importance for Biodiversity. This strategic connectivity is essential for successful nature recovery and demonstrates forward-thinking planning that aligns with national biodiversity objectives. However, we strongly object to Policy ENV4 as unsound due to paragraph 4, which permits development on Local Wildlife Sites with mitigation. This provision fails multiple tests of soundness and undermines the policy's overall effectiveness. Failure of the Justified Test Paragraph 4 contains a fundamental logical contradiction. Local Wildlife Sites are designated specifically		that every reasonable effort has been taken to minimise the harm arising through avoidance, and any residual harm arising is fully mitigated. ~~there~~ are exceptional reasons to justify development in that location . Proposals must demonstrate that every reasonable effort has been

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											sites, the policy represents a failure to have proper regard to biodiversity conservation and enhancement. This approach undermines the Council's ability to properly discharge its legal obligations and conflicts with best practice demonstrated by other local authorities.						because they are significant biodiversity assets that merit protection. If these sites could be simply replaced through mitigation measures, they would not meet the criteria for designation in the first place. The policy therefore undermines its own rationale by allowing development with mitigation on sites that have been scientifically identified as biodiversity assets of county-level importance. ENV4 - Recommended Modification To address these fundamental concerns, we recommend replacing paragraph 4 with the following: "Development proposals that would result in the loss of or harm to a Local Wildlife Site, Local Geological Site, or Potential Local Wildlife Site		taken to minimise harm through avoidance, and any residual harm must be fully mitigated."

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																	will be refused unless there are exceptional reasons to justify development in that location. Proposals must demonstrate that every reasonable effort has been taken to minimise harm through avoidance, and any residual harm must be fully mitigated." This modification would align the policy with the scientific basis for site designation, support statutory biodiversity duties, protect core components of the nature recovery network, and provide policy coherence while maintaining appropriate flexibility for truly exceptional circumstances.		
0269-0004	Organisation	Annie	Gordon	Essex Wildlife Trust	Not Stated	ENV5	Yes	4. Policy ENV5: Design Features that Encourage Biodiversity We support Policy ENV5 as a positive step toward integrating species conservation into planning policy. The policy addresses genuine conservation priorities for species facing significant	Yes		The policy meets the tests of soundness, though its ultimate effectiveness will depend on robust implementation and enforcement by the Council. The policy is positively prepared, addressing objectively assessed conservation	Recommendations for Policy Enhancement While the policy addresses the most critical species priorities, we recommend the Council considers expanding the policy to include additional design features that could further enhance biodiversity	Not Stated		No	A	Supports Policy EN5 Suggests several other species that could be specifically targetted including House Sparrows, Starlings and Soliray Bees.	Support noted. The Council has targetted just those species specifically highlighted in the NPPF a this stage (See NPPF 187d)	N

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								population declines and provides clear, implementable requirements.			needs for priority species based on evidence from the Castle Point Green and Blue Infrastructure Study and Essex Local Nature Recovery Strategy. The species selection appropriately focuses on swifts (red-listed with severe population decline), hedgehogs (now officially vulnerable to extinction), and bats (facing ongoing habitat pressures from artificial lighting and development). The policy is well-justified with clear evidence from authoritative sources and follows established best practice guidance. The requirements are proportionate and technically deliverable - swift brick requirements follow proven British Standard specifications, hedgehog gates represent practical design modifications, and bat lighting requirements reference established Institute of Lighting Professionals guidance. The policy is consistent with national policy, directly implementing NPPF paragraph 187 requirements and aligning with statutory species protection legislation. Conservation Benefits and Implementation The policy addresses critical conservation needs. Swift	outcomes. Several other integrated building features could complement the current requirements: Sparrow Terraces for communal nesting sparrows (declined by 50% since mid-1970s, red-listed), Starling Boxes for this gregarious species (declined by 66%, also red-listed), Bee Bricks for solitary bees (250 of Britain's 270 bee species, though scientific opinion remains divided on effectiveness), and Bat Access Tiles as alternatives to integrated boxes. We suggest these additional features could be included as optional enhancements or considered for future policy updates, allowing the Council to gain experience with the core requirements while building toward more comprehensive biodiversity integration. Implementation Considerations The policy would benefit from clear developer guidance on feature specifications and placement to ensure consistent, high-quality implementation. Regular assessment of feature usage could inform future policy refinements and demonstrate conservation outcomes. Brighton & Hove Council's experience with mandatory bee bricks since 2020 could provide useful lessons for expanding							

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											populations have declined by over 50% primarily due to loss of nesting opportunities in modern buildings, while hedgehogs are now officially vulnerable to extinction with habitat fragmentation being a key threat. The policy requirements will help maintain nesting opportunities and habitat connectivity respectively, while bat-sensitive lighting protects important foraging routes. However, the policy's conservation value will ultimately depend on effective implementation and long-term monitoring. The Council should ensure that installed features are properly positioned, maintained, and monitored for occupancy and effectiveness. Clear guidance on optimal placement and coordination with landscape design will be essential to maximize conservation benefits.	requirements. We would emphasise that effective enforcement and monitoring will be crucial to achieving the policy's conservation objectives. Without proper implementation oversight, even well-designed policies may fail to deliver meaningful biodiversity benefits.							
0709-0001	Individual	joy margaret	raven	F81112	Yes	SP3	Yes		No	Justified, Consistent with national policy	it doesnt meet the national policy and it is not justified .Also it is not justified as the plan is biased or predetermined towards an anti -build on the greenbelt agenda.it has excluded viable alternative sites , and is based on the excessive over development of Brownfield sites ,especially on Canvey island.	Need to add the Nort West Thundersley site ,the blinking owl site as known by many .Labelled GB16on the consulation .This 160 hectares ticks all the boxes. This could add up too 7500 homes.	No	Not Answered	Not Answered	A	North West Thundersley	North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan.	N

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																		Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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0340-0001	Individual	Warren	Smith	G&K Groundworks		B8		This submission is by and on behalf of G & K Groundworks Ltd, we consider the Castle Point Plan Regulation 19 Draft is NOT compliant, is therefore Unsound and should not be taken forward nor presented to the inspectorate as indications are it will fail the test of soundness. Which will lead to significant delays in producing a new compliant plan whilst doing so cost an excessive sum, especially when one accounts this wasted expenditure, whilst at the same time leave business's in a position of doubt surrounding their future. Some Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor	No	Not Stated	G&K Groundworks Ltd who are a significant landlord on the MTE do not consider the CPBC's Regulation 19 Draft to be Sound. Quite simply this draft Local Plan has already put a question mark over the future of any business be they existing ones that have been here for years or any new venture that might have considered bringing new business and employment to Castle Point & Specifically Benfleet It quite simply fails the tests of soundness on the very basic failure to consult. You have not consulted with: - 1) The businesses on the MTE individually or collectively. Similarly, I have it on good authority that CPBC officers, councillor nor specialist business consultants have not engaged or consulted in any format with the owners of the private road & path network. I take this opportunity to advise that I am quite prepared to participate in any inspector examination. I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. Please acknowledge receipt of my submission.				B	<u>Manor Trading Estate</u> Object to both the policy (particularly perception of partail replavement with residential) and the level of engagement to inform it.	<u>Manor Trading Estate</u> Noted Manor Trading Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'	N	

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								CPBC co-opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Fact: Local plans should be evidence driven. Where												

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								might the records of the engagement with local business be! I believe that CPBC might have some difficulty in producing that evidence to the inspector if this ever gets to that milestone. Without auditable evidence the plan will fail. That said it will more than likely get through this stage, simply because 99% of the respondents to the consultation are a specific demographic who like those councillors are of a certain age and or demographic who gained their seats on a promise to protect the Green Belt. Significantly that results in them devastating the future the local business’s that drive the local economy. There are significant other contradictory statement surrounding the draft plan. Which quite remarkably if taken in context indicate that CPBC its officers and councillors do not actually take the time even at this late stage to reflect on the true opinions of the local business’s FOR INSTANCE, this is FACT same councillors who voted through this Reg 19 on 23rd July 25 were advised on 21st July, 2 days before they unanimously voted it through. Thus, were made fully aware of what was on												

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								the council’s main regeneration page! They consciously ignored that information! They didn’t even have the integrity intelligence to relay the same to the officers. That they might get that business destroying page removed. Below is an indication that our council are in complete disarray. The web page I refer is at this link Regeneration Priorities CastlePoint V.A.T. Reg No.690 8009 25 Registered Office: 376 London Road, Hadleigh, Essex. SS7 2DA Director: G.P. Smith Company Secretary: N.D. Smith Co.Reg No.3331126 Aside from G&K Groundworks Ltd and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Fact: Local plans should be evidence driven. Where might the records of the engagement with local business be! I believe that CPBC might have some difficulty in producing that evidence to the inspector if this ever gets to that milestone. Without												

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								destroying page removed. Below is an indication that our council are in complete disarray. The web page I refer is at this link Regeneration Priorities CastlePoint . It clearly says the 4th Regeneration priority is to redevelop the MTE to housing. It further informs we the business's will be moving North of the Borough. No matter how many times they have been notified of the above the last being in a submission of Yesterday 24th Sept 25 that same statement is on the web today. For the Avoidance of Doubt, I have at appendix 1 to this unsound notification letter taken a snapshot of that page which includes the date & time it was drawn down. Further indication that perhaps CPBC are in disarray, perhaps they thought we the business had been engaged with, albeit they never visited, be that by visiting & introducing themselves, by direct letter or email contact to each & every business which of course will be available as auditable evidence! It is possible that they think the engagement was through CPBC's web-based												

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								Business forum page. That link is here Castle Point Business Forum CastlePoint The snapshot below, is from today 25/09/25 at 16.27 Hrs. It is, as it was in July when I first informed councillors who voted the draft through! It is, as it was in August & Yesterday the 24th September; Not Live, Not Operational & has not been operational since at the very latest Dec 2023! 1. There are other significant anomalies The same council officers and councillors have allowed to go unchecked 1. One document suggests only 25% (the western side of the MTE is to be used for housing. 2. Another indicates the whole of the MTE is to be used for housing 3. Remarkable both suggest 200 residential units! 4. One document suggest the MTE is 14.5 Hectares it isn't its 12.5. But significantly though CPBC based that officers and councillors have engaged with the whole of the Estate you would have thought one of them might have picked up that MTE is privately owned and that the commercial / industrial properties on the ECC highway known as Church											

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								Road are not nor have ever been part of the MTE. They are NOT. 5. Apparently as the regeneration priority Nr 4 we are still moving to the North of the borough! The only conclusion we come to is CPBC are still going to move us to that “North of the borough” location which CPBC identified as GB16 in the consultation process. YET This same council produced this Reg 19 document for committee in July in that document they discounted GB16. They appear to substantiate that rejection by producing an after the event Green Belt Review in August that relayed that GB16 was not supported by any Statutory Authority, I / we can only presume those consultees included: - Highways, NHS, Police, EA, Telecoms, Gas & Electric. Perhaps they have and will supply the inspector with that evidence.											

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0340-0002	Individual	Warren	Smith	G&K Groundworks		Procedural matters		Re The housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled “Regulation 19 Pre-Submission Draft” it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this document was not only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement, it transpires the PDF was created 30/09/2025 but regardless of when it was first discussed or a topic on conversation it was not agreed until 29th September 3 days after the closing date of the regulation 19 consultation.								B	Procedural matters Re The Housing Capacity Topic Paper of August 2025. Meta Data indicates that this PDF was converted on 15th August 2025. 23 days after the committee voted on 23rd July & 14 days after the Reg 19 consultation commenced. Conclusion This was not available to either councillors or the public. Re the statement of common ground, is entitled “Regulation 19 Pre-Submission Draft” it is clearly not a document that was produced pre the Reg 19 approval! The Reg 19 consultation closed on 26th Sept 2025, this document was not only not available it was not produced until the earliest in August 2025 – albeit it has no meta data that identifies the true date of the agreement, it transpires the PDF	Noted	N

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0819-0001	Individual	Samantha	Whelan	GB Vehicles	Yes	SP3	No	Are there not other areas? Lowering jobs and increasing traffic	No	Justified	The local plan is not justified with the national policy. Doesn't meet the housing target for CPBC. Site selections ignore greenbelt/greybelt against new NPPF guidelines. Site selection strategy is biased and predetermined towards a "no greenbelt built policy". This is based on over development of Brownfields sites. Not all sites considered. No greenbelt/greybelt sites added and with the exclusion of NW Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey's unique geography and drainage infrastructure. The proposed homes for Canvey is not resident led and this development would put residents in the East of Canvey at risk with emergency evacuation.	Add NW Thundersley site. 187HA A greenbelt//greybelt Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200 with Canvey at 1050.	No	Not Answered	Not Answered	A	Not meeting standard method Lack of Five Year Housing Land Supply Green/Grey Belt not considered North West Thundersley Flood Risk on Canvey Emergency Evacuation Concerns	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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																		Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the	

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																		Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our	

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																		Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Flooding on	

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																		Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to	

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																		Canvey. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	

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0343-0001	Agent	Ben	Weedall	Gladman Developments Ltd		For word		3.1.1 The Duty to Cooperate requires engagement with prescribed bodies on relevant strategic and cross boundary matters. Paragraphs 24-27 of the NPPF sets out the requirements for Duty to Cooperate to ensure a positively prepared and justified strategy. The NPPF requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan. Similar issues were also identified in the preparation of Castle Point's new Local Plan(s) as identified above. 3.1.2 Local planning authorities are expected to cooperate through the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on								B	<u>Duty to Cooperate</u> Suggest that the Council has not complied with DtC through the preparation of Statement(s) of Common Ground (SoCG)	<u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more SoCG, throughout the plan making process. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs. 3.1.3 There has been no evidence presented as part of this consultation which demonstrates how the Council have met the above duty to cooperate. Whilst the Housing Capacity Topic Paper notes that there have been discussions with neighbouring authorities this is as far as the evidence goes and it is not available for comment alongside this consultation. Without this											

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								evidence there is a real risk that the mistakes of the previous 2011-2031 Local Plan will be repeated which had to be withdrawn from examination due The Castle Point Plan 2026-2043 Regulation 19 Draft July - September 2025 8 to a failure to discharge the duty to cooperate. If this evidence is available, it should be presented alongside the submission of this plan, if it is to progress that far.											
0343-0002	Agent	Ben	Weedall	Gladman Developments ltd		Green Belt Assessment	No	3.3.1 An up-to-date assessment of the Green Belt has been undertaken to support preparation of the Plan. This Green Belt Assessment (GBA) concludes that 12 sub-areas are recommended for further consideration by the Council in the plan making process. 3.3.2 It is not clear where this further consideration has taken place and this must be appropriately evidenced. 3.3.3 Land at Glebelands is one site assessed by the GBA (GB4), it is found to have a moderate contribution to purpose a) and a weak contribution to purpose b). Gladman agree with this position.	No							B	The Green Belt Assessment (GBA) concludes that 12 sub-areas are recommended for further consideration by the Council in the plan making process. It is not clear where this further consideration has taken place and this Land at Glebelands is one site assessed by the GBA (GB4), it is found to have a moderate contribution to purpose a) and a weak contribution to purpose b). Gladman agree with this position.	Green Belt options were given specific consideration in the Green Belt Assessment evidence. All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	N

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								3.3.4 The GBA goes on to identify 19 sub areas could be defined as grey belt due to the performance against purposes a) and b). Purpose d is not assessed as there is no historic towns within the authority. 3.3.5 Land off Glebelands is correctly identified as ('potential') Grey Belt following consideration of purposes a) and b).									The GBA goes on to identify 19 sub areas could be defined as grey belt due to the performance against purposes a) and b). Purpose d is not assessed as there is no historic towns within the authority. Land off Glebelands is correctly identified as ('potential') Grey Belt following consideration of purposes a) and b).		

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0343-0003	Agent	Ben	Weedall	Gladman Developments Ltd		SP3	No	Fundamentally, Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 as proposed is unsound and should not proceed in its current form. The Plan does not plan for the Council’s required housing need as calculated by the Standard Methodology and enshrined in national planning policy. The justification for not meeting this requirement is not satisfactory nor sufficiently evidenced by the Council. 1.1.6 Gladman is promoting land in Benfleet through the emerging Castle Point Plan. This concerns land at Glebelands which is suitable for approximately 165 dwellings (the Site). The Site is available, suitable, and deliverable for housing as summarised in Section 5 of this representation. For the purposes of the Local Plan 2026 – 2043 this is an omission site despite the previous plan making history set out in Section 2 and the sites suitability for the reasons set out therein. 1.1.7 Amendments to Green Belt boundaries are necessary in order to deliver sustainable development in the Borough and land off Glebelands should be	No		With regards the Council’s concern around the impacts of growth from Green Belt release on the highways and ability for sites to support sustainable infrastructure, the Council’s housing topic paper identifies that those sites located away from town centres and transport corridor do not have ready access to services or public transport provision and do not contribute towards the critical mass to make shops and services more viable, and public transport and cycling measures viable and feasible. 3.4.15 It goes on to note that edge of town Green Belt sites have been promoted to the Council at circa 30-40 dwellings per hectare which is unlikely to sustain a bespoke services in the long term. However, the Transport Assessment Scoping document contradicts this statement noting that all of the Call for Site sites have the potential to be brought forward in a manner which would support active and sustainable transport measures and where the local impacts of associated transport demand could be accommodated and/or mitigated. In particular GB4 Land at Glebelands is noted	It is clear from the discussion above that the Castle Point plan as currently presented is insufficient regarding housing delivery. The plan will only be making provision for approximately half of the standard methodology requirement and there is no evidence presented to demonstrate whilst the Council cannot deliver its full requirement and nor any agreed positions in terms of assistance from neighbouring authorities. 3.5.2 No significant amendments to the Green Belt boundaries are proposed despite assessment of the Green Belt boundaries finding 12 areas worthy of further consideration. 3.5.3 It is clear that this plan should not progress further as proposed the Council must first evidence should be presented of the joint working to date to satisfy the requirements of the duty to cooperate, and sites should be identified after further consideration of the 12 areas identified by the Green Belt, this may be either option 2A or 2B from the SA of Policy SP3.			Yes, Site Submission Profile for Land off Glebelands, Benfleet - Page 19 of PDF	B	The Plan does not plan for the Council’s required housing need as calculated by the Standard Methodology and enshrined in national planning policy. Promotes land at Glebelands. Argues Green Belt boundaries should have been released and changed.	Housing need, including standard method, considered through the supporting evidence. Green Belt/Grey belt covered under policy GB2.	N

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								removed the Green Belt for the reasons set out in the Council’s own evidence base supporting the Plan. 3.4.1 The plan seeks to provide for a minimum of 6,196 homes over the plan period to 2034, at an average of 364 dwellings per annum. This falls significantly short of the current standard methodology target of 686 dwellings per annum. This policy is not sound, not positively prepared and inconsistent with national policy. 3.4.2 The national situation is set out concisely in a letter from Baroness Taylor, the Parliamentary Under Secretary of State at the Ministry of Housing, Communities and The Castle Point Plan 2026-2043 Regulation 19 Draft July - September 2025 10 Local Government to Cotswold District Council in August 20252, regarding the Council’s “deep concerns” over revised housing targets for the district, which states: ‘...we are in the middle of one of the most acute housing crises in living memory. Home ownership is out of reach for too many, too few homes are built and even fewer are genuinely			to have access to bus routes 21 and 22, the nearest station is Benfleet, accessible by bus connection as well as having access to LCWIP corridors 1 and 1a and access to national highway junctions 8 and 14. This indicates that one the sites will be able to utilise the existing public transport and sustainable modes of travel in the area and through their patronage keep these services operating and secondly the individual schemes can address potential impacts on the highway network which may arise. This does not provide strong reasoning for the Council to not amend the Green Belt based on the capacity of the highways network. 3.4.17 Castle Point has a demonstrable unmet need for housing in light of the lack of a five-year housing land supply. Therefore development of Green Belt land that does not have any undue impacts on the wider countryside and Green Belt around and that the site should be considered for development, where it does not make a strong contribution to any one of purposes (a), (b), or (d) of the Green Belt purposes outlined in paragraph 143								

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								affordable.’ 3.4.3 The letter goes on to state: ‘all areas of the country must play their part in building the homes we need. The Government expects local authorities to explore all options to deliver the homes their communities need: maximising brownfield land, working with neighbouring authorities, and, where necessary, reviewing Green Belt. Each authority is expected to assess and plan how to meet its local housing needs over the plan period.’ 3.4.4 It is clear that Castle Point has also failed in such an approach and not playing its part in trying to deliver the homes the country and the local area needs. It is failing to deliver for its own residents and demonstrating effective work with its neighbours, to pursue the findings of this plans supporting Green Belt review and to deliver the housing needs of the Borough in accordance with national policy. 3.4.5 The steps needed to release and change Green Belt boundaries is set out within paragraph 145, 146 and 147 of the NPPF. NPPF paragraph 145 states that			of the NPPF. Subsequently this land in Castle Point is defined as Grey Belt if brought forward in a sustainable manner in accordance with national policy with reference to paragraphs 110 and 115 of the NPPF and also complies with the Golden Rules in accordance with Affordable Housing, Infrastructure and Green Spaces requirements as set out in national and local planning policy. The NPPF goes on at paragraph 116 to state that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.” 3.4.19 It is clear from the Council’s own assessments that there would not be a severe impact upon the local highway network from identified growth options and there is no reason to prevent development on these grounds. 3.4.20 The above demonstrates that there are exceptional circumstances to support amendments to the Green								

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								once established Green Belt boundaries should only be altered where exceptional circumstances are full evidenced and justified through the preparation or updating of plans. Paragraph 146 goes on to state that these exceptional circumstances can include, but are not limited to, an authority not being able to meet its identified needs for homes, commercial or other development through other means. If these exceptional circumstances exist, then authorities should review the Green Belt boundaries in order to meet the needs in full. Paragraph 147 of the NPPF sets out the criteria which authorities assess before concluding that exceptional circumstances exist to justify the change in Green Belt boundaries. This includes demonstrating that it has examined fully all other reasonable options for meeting its identified need for development. The first and second require the 2 Letter from MHCLG to Cotswold District Council (18th August 2025) 11 Council to demonstrate that the strategy makes as much use as possible of suitable brownfield sites and underutilised land. The Council’s own consultation			Belt boundaries. The approach by the Council is fundamentally unsound and is not supported by its own evidence base. The Local Plan strategy should be revisited at and the Green Belt boundaries amended to support additional location that will increase the supply of both market and affordable homes or it can only be found unsound.								

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								document makes clear that the strategy being put forward relies heavily on the use of brownfield land as it focuses development within the urban area. The third criteria, requires the strategy to have been informed by discussions with neighbouring authorities about the accommodation of growth through a statement of common ground. As identified earlier within these representations there has been no evidence provided that there have been meaningful discussions with neighbouring authorities and there is no statement of common ground provided. Whilst there is no objection to deliver housing on brownfield sites, the NPPF does not support a brownfield first policy and sites other than brownfield are required in order to deliver the Borough's housing needs as identified by the Council's own assessments (in that it is only seeking to deliver around half of the Standard Method's requirements). 3.4.8 It is clear therefore that exceptional circumstances exist, and the Green Belt boundaries should be amended to ensure that the full housing requirement is											

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								met. 3.4.9 There is one more step which needs to be taken when assessing whether Green Belt boundaries should be altered. Paragraph 146 adds the caveat that if a Green Belt review demonstrates that changes would fundamentally undermine the purposes (taken together) of the remaining Green Belt this may also justify a reduction in meeting the housing needs in full. 3.4.10 Despite this evidence of overwhelming housing need and lack of impacts upon the strategic function of the Green Belt, the Council has elected not to alter the Green Belt boundaries. 3.4.11 Castle Point should meet it's housing target as calculated by the Standard Method as required national policy. Therefore sustainable Green Belt release will be required to meet the housing requirement where this Green Belt does not prevent urban sprawl, prevent neighbouring towns from merging and preserve the setting and special character of historic towns. As previously identified in the preceding section, the												

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								Council’s own Green Belt assessment has assessed parcels of Green Belt capable of release without undermining the remaining Green Belt and its strategic functions. 3.4.12 The justification given by the Council in the supporting text to SP3 is identified that achieving the total housing target “would significantly and irreversibly destroy large tracks of Green Belt, including land which strongly contributes to the Green Belt purposes, and undermine the approach to protected and enhancing the natural environment.” It goes on to note that “transport modelling has shown that the road network in Castle Point, operates at capacity already, and the impacts of growth would be severe. It has also been demonstrated that there are sustainable accessibility and accessibility issues with sites within the Green Belt that would act to worsen this situation without being able to provide the levels of mitigation necessary to reduce impacts on the strategic road network”. This is supported by the Housing Capacity Topic Paper which identifies other footnote 7 constraints, biodiversity designations											

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								under the NERC Act, flood risk, open space deficit and heritage considerations.											
0343-0004	Agent	Ben	Weedall	Gladman Developments Ltd		Hou 2	Yes	Gladman note that all proposals for new residential development resulting in 10 or more net additional homes (or 0.5 hectares or more) exceptionally permitted on grey belt land or otherwise within the extent of the Green Belt will provide 50% affordable housing, of which 50% will be for social rent, and 50% will be for	Yes							B	Support approach to Affordable Housing	Noted	N

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								affordable home ownership. This approach is supported in order to demonstrate that development can be brought forward that complies with the Golden Rules in accordance with Affordable Housing ensuring that the development is sustainable and is in accordance with national policy with reference to paragraphs 110 and 115 of the NPPF.											
0343-0005	Agent	Ben	Weedall	Gladman Developments Ltd		Hou3	Yes	Gladman agree that a range of house types are required to meet local requirements and to ensure mixed and balanced communities and note that house type requirements are informed by the Local Housing Needs Assessment (LHNA). As stated in the policy's reasoned justification that the housing mix should also reflect the local context of the site, as it is recognised that it will not be possible to secure a full mix of house sizes and types on all sites and that consideration will be made on an individual site basis.	Yes							B	Support for Policy Hou3. Gladman agree that a range of house types are required to meet local requirements and to ensure mixed and balanced communities and note that house type requirements are informed by the Local Housing Needs Assessment (LHNA). Note reasoned justification caveats.	Noted	N
0343-0006	Agent	Ben	Weedall	Gladman Developments Ltd		D2	No	Gladman support the Council's proposed approach to seeking higher density in areas in appropriate locations. It is important to optimise density, whilst having regard to local character and appearances, provide	No							B	Support the Council's proposed approach to seeking higher density in areas in appropriate locations. But do not support the Council's	Noted	N

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								communal and public amenity multi-functional spaces, enhance permeability and improve access to services in the local area by well connected active and sustainable modes and to be of exemplary design, contributing to the evolution of local character. Gladman however do not support the Council's approach or consideration of 'premium sustainability'. Clearly there are locations where higher density is appropriate but such a definition of 'premium sustainability' is not supported or set in national policy. The Council should revisit this definition accordingly.									approach or consideration of 'premium sustainability'. Clearly there are locations where higher density is appropriate but such a definition of 'premium sustainability' is not supported or set in national policy.		
0343-0007	Agent	Ben	Weedall	Gladman Developments Ltd		GB1	Not Stated	In conjunction with the commentary on Policy SP3 – Meeting Development Needs outlined above, Gladman note that Council position that: Development of Grey Belt land is permissible where development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainably located with good access to services and transport choices, and where high levels of								B	The policy should be amended to reflect national policy and support grey belt development.	Noted Green Belt/Grey belt covered under policy GB2. Development decisions will be informed by consideration of the NPPF in it's entirety. The Council has undertaken a Green Belt	N

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								affordable housing, infrastructure and open space provision are secured. 4.1.7 The supporting text considers grey belt land and notes that “Development of Grey Belt land is permissible where development would not fundamentally undermine the purposes (taken together of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainability located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured”. This consideration is not reflected within the policy itself which does not mention grey belt within it – the policy should be amended to reflect national policy and support grey belt development. 4.1.0 As detailed in the policy, we also note that certain exceptions exist which regard development in the Green Belt to not be inappropriate and that development should not approved unless very special circumstances												Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of	

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								exist, where potential harm to the Green Belt by reason of the inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. As discussed, Castle Point Borough Council previously proposed to allocate Green Belt Land for residential development. Evidence submitted to justify this approach was supported by the Council and the plan underwent examination between May and June 2021 with the examining Inspector providing their report on the plan in March 2022 finding the plan sound.										the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt	

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																		Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	
0343-0008	Agent	Ben	Weedall	Gladman Developments Ltd		GB2	Not Stated	In conjunction with the commentary on Policy SP3 – Meeting Development Needs outlined above, Gladman note that Council position that: Development of Grey Belt land is permissible where development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainably located with good access to services and transport choices, and where high levels of affordable housing,								B	Policy SP3 - further comments on Grey Belt	The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity	N

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So un d?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d		
								infrastructure and open space provision are secured. 4.1.7 The supporting text considers grey belt land and notes that “Development of Grey Belt land is permissible where development would not fundamentally undermine the purposes (taken together of the remaining Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainability located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured”. This consideration is not reflected within the policy itself which does not mention grey belt within it – the policy should be amended to reflect national policy and support grey belt development. 4.1.0 As detailed in the policy, we also note that certain exceptions exist which regard development in the Green Belt to not be inappropriate and that development should not approved unless very special circumstances exist, where potential harm												Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green	

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								to the Green Belt by reason of the inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. As discussed, Castle Point Borough Council previously proposed to allocate Green Belt Land for residential development. Evidence submitted to justify this approach was supported by the Council and the plan underwent examination between May and June 2021 with the examining Inspector providing their report on the plan in March 2022 finding the plan sound.										Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt	

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																		Assessments still form part of the evidence and considered wider areas.	
0343-0009	Agent	Ben	Weedall	Gladman Developments Ltd		ENV 3	Not Stated	This policy will require all major development to achieve minimum biodiversity net gain of 20%. Gladman do not consider it sound for a higher requirement to be placed over and above the national policy requirement of 10%. 4.1.2 In considering the soundness of this policy it is necessary to consider paragraph 74-006-20240214 of PPG which states that: “... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any	No		Gladman does not consider that the evidence used to justify this approach is sufficiently robust and as such 10% should be the requirement.					B	Comment on BNG and evidence for 20%.	As set out in paragraph 18.29 'The Environment Act 2021 introduced Biodiversity Net Gain. This mandates that most developments should deliver at least 10% biodiversity net gain, using a specific metric developed by the Government. Local areas can set a higher requirement through their plans where it can be demonstrated	N

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								impacts on viability for development. Consideration will also need to be given to how the policy will be implemented”										<i>it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature Recovery network identified through the Local Nature Recovery Strategy for Essex.'</i>	
0343-0010	Agent	Ben	Weedall	Gladman Developments Ltd		SD4	Not Stated	This policy requires all new development to be fossil fuel free and demonstrate net zero operation carbon onsite, by achieving an energy use standard of 35kwh/m2/year for all new dwellings. These new dwellings are also identified as having a space heating demand of less than 15 kwh/mw/year. Gladman agree that there is a need to reduce carbon emissions in both the construction and use of residential	No	Not Stated						B	Policy SD4 Gladman do not consider that the Council's policy is necessary as there is already a national approach set out in Building Regulations and in the form of the Future Homes Standard and may also be covered through the National Development	As set out in reasoned justification paragraphs to Policy SD4, this has been informed by work at County level.	N

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								development. However, Gladman do not consider that the Council's policy is necessary as there is already a national approach set out in Building Regulations and in the form of the Future Homes Standard and may also be covered through the National Development Management policies which are being drawn up. By utilising a national rather than local approach ensure uniformity across the whole country rather than a variety of different approaches which differ between local authority areas.									Management policies which are being drawn up. By utilising a national rather than local approach ensure uniformity across the whole country rather than a variety of different approaches which differ between local authority areas.		
0343-0011	Agent	Ben	Weedall	Gladman Developments Ltd		SD5	Not Stated	This policy requires proposals for large scale new-build developments, for residential schemes this is minimum of 100 dwellings, to submit a Whole Life-Cycle Carbon Assessment that demonstrates development meets the identified targets. As with the above policy this is a matter which best addressed at the national, rather than local level, to ensure that high standards are met across the entire country and avoid any confusion and repetition between local and national policies.	Not Stated							B	Policy SD5 As with policy SD4 this is a matter which best addressed at the national, rather than local level, to ensure that high standards are met across the entire country and avoid any confusion and repetition between local and national policies.	As set out in reasoned justification paragraphs to Policy SD5, this has been informed by work at County level.	N

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0343-0012	Agent	Ben	Weedall	Gladman Developments Ltd		SD9		The policy requires all new residential development to achieve a water efficiency standard of 90 litres per person per day. New development should incorporate rainwater harvesting and grey water technologies for non-potable water uses on site. Finally, new development should demonstrate that adequate foul water treatment and drainage already exist or can be provided in time to serve the development. 4.1.7 The requirement for 90 litres per person is not in line with national policy which requires residential development to achieve 110 l/p/d, additionally this requirement is for water stressed areas. The water standard is best calculated at a national level in accordance with building regulations, currently the future water standards are being considered which will phase the introduction of consistent standards across the country. 4.1.8 With regards to foul water, it is not the responsibility of the housebuilder to ensure that the water company can service a development by providing connections. Water companies have a legal responsibility to								B	Policy SD9 Object to lower water efficiency standards. State that the The water standard is best calculated at a national level in accordance with building regulations,	Noted. Policy SD9 supported by evidence, noting that Essex is a water stressed area.	N

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								ensure that the requirements of the development plan system can be met by virtue of the Water Industry Act 1991. 4.1.9 The Water Companies are required by law to publish a Water Resource Management Plan every five years which is approved by the Environment Agency and Defra, as part of this the water company will need to account for future development requirements of the local authority. Therefore this policy should be removed from the plan as it is dealt with by other provisions under other legislation as above.											
0343-0013	Agent	Ben	Weedall	Gladman Developments Ltd		Whole Plan	No	Gladman welcome the opportunity to comment on the Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 consultation. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2024) and the associated updates that were made to Planning Practice Guidance. 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully	No		6.1.4 As discussed, principally, the Council is not planning for their housing target as calculated using the Standard Methodology as required by national planning policy. Justification for this reduced requirement provided by the Council that the authority cannot deliver their required housing target without Green Belt release is not satisfactory evidence to support this reduction in housing requirement in line with national planning policy. 6.1.5 The Council's approach					B	Not meeting national housing figure. Should proceed with Option 2a as identified in the Sustainability appraisal.	Noted	N

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								explored during the process of undertaking the new Local Plan. 6.1.3 The Castle Point Council Plan 2026 – 2043 Regulation 19 Draft July 2025 document as proposed is unsound.			should be reconsidered in order to deliver Castle Point’s housing requirement, with the Council at the very least moving forward with Option 2a as identified in the Sustainability appraisal. 6.1.6 In its current form, the Plan will be found unsound and progressing the Local Plan to examination stage would not be an appropriate use of both public resources and expenditure. Local authorities should not be allowed to a submit plan that they consider unsound, with Castle Point Borough Council recognising themselves that there is a considerable risk of the plan being found unsound when considered against NPPF 2024. 6.1.7 Submission of the Plan will be contrary to paragraph 20 of the Planning and Compulsory Purchase act (PCPA) 2004 which confirms that an authority must not submit a plan unless think it is ready for independent examination. The Council would therefore be open to legal challenge if it submits a plan for examination that itself considers is at significant risk of being found unsound. 6.1.8 The Council must revisit its								

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											strategy in its Local Plan and allocate sites appropriately or set policies in order to meet its objectives and requirement in delivering housing as required by national policy.								
0994-0001	Agent	Barry	Veater	Goverresources Ltd OBO Barry Veater	Yes	SP3	Yes		No	Consistent with national policy	Despite supporting Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places, the Policy SP3 shortfall in projected housing provision of 5466 homes over the plan period, is so far from being consistent with national policy that the Plan is likely to fall very early in the Examination process, if indeed it gets that far. The District is very tightly constrained by water/marshes, protected sites, and Green Belt Land, however a single Green Belt release in NW Thundersley, with appropriate infrastructure and improvements to the remaining Green Belt land warrants more investigation. The potential intensification of urban sites and	Policy SP3 should include one suitable Green Belt site, the least potentially damaging possible site, to raise the likelihood of the Castle Point Plan proceeding to adoption and thereby providing a plan-led approach to development in Castle Point.	No	Not Answered	Not Answered	A	Despite supporting Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places, the Policy SP3 shortfall in projected housing provision of 5466 homes over the plan period, is so far from being consistent with national policy that the Plan is likely to fall very early in the Examination process, if indeed it gets that far. The District is very tightly constrained by water/marshes, protected sites, and Green Belt Land, however a single Green Belt release in NW Thundersley, with	Noted	N

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											brownfield development must ensure that sufficient space remains for employment use and commercial space.						appropriate infrastructure and improvements to the remaining Green Belt land warrants more investigation. The potential intensification of urban sites and brownfield development must ensure that sufficient space remains for employment use and commercial space.		
0994-0002	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	HAD1	Yes		No	Consistent with national policy	Policy Had2 is supported with the exception of a missing ingredient, which is the usability of the resulting active travel and for those less able. It is essential that Policy Had2 considers how residents and visitors will move around in the intensified town centre.	Add a criterion, borrowing from T2 - Active travel improvements, to ensure development on e.g. Castle Lane Car Park retains access through the site resulting in an attractive walking/cycling environment to Hadleigh Castle. It is similarly important that The Island Site includes safe and accessible crossing points so elderly or infirm residents do not have to walk around the site to reach the facilities beyond it and do not risk crossing without the protection of proper pedestrian crossing points.	No	Not Answered			Supports policy HAD2 but suggests that it needs to consider sustainable active travel for all around the town centre	Policy HAD2 does not include the town centre. Policy HAD1 includes improvements to active and sustainable travel options and any development will have to accord with Policies T1-T8 as appropriate.	N
0994-0003	Agent	Barry	Veater	Govresources Ltd OBO Barry	Yes	HAD3	Yes		No	Justified	Policy Had3 assumes that the Council is receiving accurate information about the position of the clinic to be surplus to requirements.	The definition of 'nearby' in criterion 1. should be clearly defined. It would not be acceptable, for example, if the facilities provided at the clinic were relocated to	No	Not Answered			what constitutes as nearby in relation to the location of the NHS facility	as detailed in the supporting text at paragraph 10.25 re-provision if required will be	N

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				Veater							Criterion 1. of the policy says that the services operating from the facility can be provided elsewhere nearby. What would constitute 'nearby'?	Benfleet, making it difficult for those without transport to take advantage of the services provided.						elsewhere in the Hadleigh area.	
0994-0004	Agent	Barry	Veater	Govresources Ltd OBO Barry Veater	Yes	HAD4	Yes		No	Consistent with national policy	It is unreasonable for children from an infants school to be expected to travel to enhanced playing field facilities elsewhere. A reduction in the site area should be considered to retain sufficient space for children at the school. In addition, parking provision for 114 new homes on the site would create further parking problems on Scrub Lane particularly at the start and end of the school day. The number of homes should be reduced to a single line fronting Scrub Lane.	The depth of the site should be reduced to retain sufficient playing field space for the school and to ensure sufficient space can be provided for residents cars to ensure there is no further spillage of parked cars on to Scrub Lane.	No	Not Answered			Objecting to HAD4: reduce the size of the site to provide extra field provision to the school Parking capacity on scrub lane Development should be one single line	The NPPF at chapter 11 states tghat policies should promote an effective use of land, therefore by	N

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0901-0001	Organisation	Rosanna	Tunadine	Habinteg Housing Association	Yes	HOU4	Yes		Yes		As an expert housing provider, we welcome the opportunity to comment on the development of the Castle Point local plan. Habinteg is a housing association that champions inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone. With over 50 years’ experience in housing and disability, we manage over 3300 accessible properties across England. We believe that people are disabled by barriers in society and negative public attitudes, rather than by their own impairments. Habinteg strongly supports that the local plan includes accessibility design standards, specifically Building Regulations M4(2) and M4(3). We believe that Policy Hou4 is an exemplary policy that sets a high ambition for providing homes for older and disabled people and avoids ambiguity. 1. All new homes will be delivered in accordance with accessibility standards as follows: a. 100% of all new homes will be built to standard M4(2); b. 10% of all new homes		Not Answered	Not Answered	Yes			Supports requirements set out in policy HOU4	Support noted.	N

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											will be built to standard M4(3). The simple, robust language used alongside clear percentages leaves little room for doubt in the local authority's commitment to accessible and adaptable homes. The ambition is equal to the London Plan which we believe is the strongest accessible housing policy in the country. This approach not only supports inclusive communities but also reduces long-term costs which may otherwise fall to the local authority, for example, stairlift installation in an M4(2) home costs significantly less (£2,500–£4,000) than in a home built before the standards came into effect (£9,000–£10,000). The benefits of M4(2) homes are plentiful, and amongst them, new homes that meet category M4(2) will deliver: • faster hospital discharges • less costly and speedier adaptations when required • reduced local government expenditure on domiciliary care packages by supporting individual independence within the home • delay or avoid moves to								

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											more expensive residential care settings • provide a better environment for ongoing independence when needs change. Mandating 10% of new homes built meet the M4(3) wheelchair user standards will generate significant social and economic value – by reducing reliance on social care, minimising accidents in the home and maximising the potential for disabled people to be economically active and take up employment. (See Habinteg’s 2023 report with London School of Economics: Living not Existing) The benefits of M4(3) homes are plentiful, and amongst them, new homes that meet category M4(3) will deliver: • For a working age wheelchair user, the benefit of living in a wheelchair user home can be valued at around £94,000 over a 10 year period. • For a later years wheelchair user household (aged 65 and over), the benefit could be around £100,000 over a 10 year period. • For a household with a								

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											child who is a wheelchair user, the benefit of living in a suitable wheelchair user home could be around £67,000 over a 10 year period. • Removes or reduces the cost of care assistance in the home • Improves confidence, independence, and self esteem • Having a secure and appropriate home enables greater social inclusion and community participation • Reduction in trips and falls in the home. Policy Hou4 is an excellent accessible housing policy. The Local Plan could play a key role in ensuring that accessible homes are delivered by requiring planning teams to track and report the number of homes approved under the M4(2) and M4(3) standards. This data will support more effective strategic planning and ensure that delivery aligns with local needs. Dwelling mix and quality for older people Considering the wide range of needs experienced by older people the Authority should ensure that the local plan stipulates a proportion of older persons housing, where								

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											newly developed, to be designed to fully wheelchair accessible standard. Habinteg also recommends referring would be developers to the recently published 'Inclusive Housing Design Guide' which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people. Location and context of developments Disabled and older people have told Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and amenities are all important to providing places that are truly liveable which enable people go participate int their local community. Consideration should									

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											therefore be given in the local plan as to how the Authority wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity.								
0992-0001	Agent	Timothy	Manana	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Hillside Enterprises have submitted an outline planning application for up to 160 dwellings at land at Solby Wood Farm, Daws Heath and are promoting the site through the Local Plan. It is considered that the Draft Local Plan does not meet the needs of the area in meeting its significant housing need due to its failure to release		No	Not Answered	Yes	B - see additional supporting evidence	Hillside Enterprises have submitted an outline planning application for up to 160 dwellings at land at Solby Wood Farm, Daws Heath and are promoting the site through the Local Plan. It is considered that the Draft Local Plan does not meet the	Noted	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Green Belt land, thus failing the test of ‘soundness’ as listed within Paragraph 64 of the NPPF (2024). We would urge Castle Point to reconsider their approach to meeting development needs and the Green Belt to ensure that the needs for the Borough are met. This policy sets out that The Castle Point Local Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. Paragraph 6.50 then goes on to say that this will be achieved by, ‘at 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) at least 554 homes per year from 2031-43 (years 11 to 17).’ Notwithstanding this, the Draft Local Plan acknowledges that the current target for Castle Point as established using the standard methodology set out in the revised NPPF (2024) is 11,662 homes over the plan period, equating to 686 new dwellings per annum. Whilst it is acknowledged that Castle Point references the reasons as to why they cannot achieve the standard methodology number, this goes against the Government’s objective of significantly boosting the						needs of the area in meeting its significant housing need due to its failure to release Green Belt land, thus failing the test of ‘soundness’ as listed within Paragraph 64 of the NPPF (2024). We would urge Castle Point to reconsider their approach to meeting development needs and the Green Belt to ensure that the needs for the Borough are met. This policy sets out that The Castle Point Local Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. Paragraph 6.50 then goes on to say that this will be achieved by, ‘at 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) at least 554 homes per year from 2031-43 (years 11 to 17).’ Notwithstanding		

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											supply of homes and indeed, Paragraph 62 of the NPPF (2024) which makes it clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in National Planning Practice Guidance. The Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that the Council could not demonstrate a five year supply of deliverable housing sites, with a supply between 0.55 and 0.69 years, demonstrating that Castle Point's current projected housing figure falls significantly below the requirements. Further, the proposed development within Policy SP3 states that almost half of all new homes within the plan period will be delivered within Canvey Island, which is considered to be an unsustainable approach to development and does not accord with Paragraph 61 of the NPPF (2024) which requires a 'variety of land' to deliver a sufficient supply of homes.						this, the Draft Local Plan acknowledges that the current target for Castle Point as established using the standard methodology set out in the revised NPPF (2024) is 11,662 homes over the plan period, equating to 686 new dwellings per annum. Whilst it is acknowledged that Castle Point references the reasons as to why they cannot achieve the standard methodology number, this goes against the Government's objective of significantly boosting the supply of homes and indeed, Paragraph 62 of the NPPF (2024) which makes it clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in National		

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																	Planning Practice Guidance. The Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that the Council could not demonstrate a five year supply of deliverable housing sites, with a supply between 0.55 and 0.69 years, demonstrating that Castle Point's current projected housing figure falls significantly below the requirements. Further, the proposed development within Policy SP3 states that almost half of all new homes within the plan period will be delivered within Canvey Island, which is considered to be an unsustainable approach to development and does not accord with Paragraph 61 of the NPPF (2024) which requires a 'variety of land' to deliver a sufficient supply of homes.		

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0992-0002	Agent	Timothy	Manana	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The council's Green Belt Assessment identified that land at Solby Wood Farm contributed strongly to the purposes of the Green Belt. However, we would urge Castle Point to reconsider the site as a sustainable Grey Belt residential allocation. At the national level, the assessment and potential reclassification of Green Belt is directed by the NPPF and PPG, which provide the statutory framework for designation and introduce the concept of 'Grey Belt'. The key policy test is whether the release of land would undermine the five purposes of the Green Belt, with Purposes (c) and (e) generally excluded from localised appraisals. The recent Castle Point Green Belt Assessment (GBA, 2025) applies this framework to sub-area GB 11: South West of Daws Heath, within which the Site lies. The GBA assesses GB 11 as making a Strong contribution to Purpose (a) and a Moderate contribution to Purpose (b). However, further analysis shows these contributions are overstated. For example, the sub-area is already physically well-contained by Ancient Woodland and		No	Not Answered	Yes	B - see additional supporting evidence	The council's Green Belt Assessment identified that land at Solby Wood Farm contributed strongly to the purposes of the Green Belt. However, we would urge Castle Point to reconsider the site as a sustainable Grey Belt residential allocation. At the national level, the assessment and potential reclassification of Green Belt is directed by the NPPF and PPG, which provide the statutory framework for designation and introduce the concept of 'Grey Belt'. The key policy test is whether the release of land would undermine the five purposes of the Green Belt, with Purposes (c) and (e) generally excluded from localised appraisals. The recent Castle Point Green Belt Assessment (GBA,	Noted	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required	
											neighbouring settlements, meaning any development would follow a logical and defined edge rather than constituting unrestricted sprawl. Moreover, Daws Heath is consistently defined by the Council as a village rather than a town, limiting the applicability of Purpose (b). Lastly, Purpose (d) is excluded from the GBA and therefore offers no contribution to the assessment of GB 11. When aligned with the NPPF purposes however, the Site does not perform strongly against Purposes (a), (b) or (d), ultimately supporting its reclassification as potential Grey Belt land. Evidence from adjacent Parcels 4 and 8 shows that existing development has already weakened their contribution to the Green Belt purposes, reinforcing the limited impact that development of GB 11 would have. The GBA ultimately concludes that releasing GB 11 would be unlikely to cause significant harm to the wider Green Belt due to its contained nature and separation from the main network. The Proposed Development would not therefore fundamentally compromise the wider Green Belt function. On this basis, GB							2025) applies this framework to sub-area GB 11: South West of Daws Heath, within which the Site lies. The GBA assesses GB 11 as making a Strong contribution to Purpose (a) and a Moderate contribution to Purpose (b). However, further analysis shows these contributions are overstated. For example, the sub-area is already physically well-contained by Ancient Woodland and neighbouring settlements, meaning any development would follow a logical and defined edge rather than constituting unrestricted sprawl. Moreover, Daws Heath is consistently defined by the Council as a village rather than a town, limiting the applicability of Purpose (b). Lastly, Purpose (d) is excluded from the GBA and therefore offers no contribution to the		

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											11 should be regarded as a potential Grey Belt candidate, consistent with national policy and guidance. Response to Green Belt Assessment relating to Land at Solby Wood Farm, Daws Heath The Site has been assessed under the updated PPG methodology and found to make only a Moderate to Weak Contribution to Green Belt Purpose (a) and a Weak or No Contribution to Purposes (b) and (d). As such, it does not fulfil a strong Green Belt function.						assessment of GB 11. When aligned with the NPPF purposes however, the Site does not perform strongly against Purposes (a), (b) or (d), ultimately supporting its reclassification as potential Grey Belt land. Evidence from adjacent Parcels 4 and 8 shows that existing development has already weakened their contribution to the Green Belt purposes, reinforcing the limited impact that development of GB 11 would have. The GBA ultimately concludes that releasing GB 11 would be unlikely to cause significant harm to the wider Green Belt due to its contained nature and separation from the main network. The Proposed Development would not therefore fundamentally compromise the wider Green Belt function. On this		

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																	basis, GB 11 should be regarded as a potential Grey Belt candidate, consistent with national policy and guidance. Response to Green Belt Assessment relating to Land at Solby Wood Farm, Daws Heath The Site has been assessed under the updated PPG methodology and found to make only a Moderate to Weak Contribution to Green Belt Purpose (a) and a Weak or No Contribution to Purposes (b) and (d). As such, it does not fulfil a strong Green Belt function.		
0992-0003	Agent	Timothy	Manana	Hillside Enterprises c/o WSP	Yes	SP3	Yes		No	Positively prepared, Justified	Paragraphs 6.54 and 6.55 indicate that the road network and health service provision within Castle Point are at capacity and that the Authority will not be able to accommodate any growth within these areas. We would question this approach taken by Castle Point, especially as the Transport Assessment (July 2025) has indicated that whilst some junctions within the Authority are congested, it does not state		No	Not Answered	Yes	B - see additional supporting evidence	Concern that that Paragraphs 6.54 and 6.55 indicate that the road network and health service provision within Castle Point are at capacity and that the Authority will not be able to accommodate any growth within these areas when the Transport Assessment (July 2025) has	The last sentence of the paragraph at 6.55 states that "This constraint is therefore a barrier to growth beyond that identified in this Plan". This explains why the transport assessment identifies mitigation for the amount of	N

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											that the whole road network is at capacity and outlines methods for improvements within the various road networks of Castle Point. The Health Impact Assessment (July 2025) outlines that Policy SP4 Development Contributions facilitates contributions to strategic infrastructure and that improving health and wellbeing outcomes for residents and visitors is crucial. Taking the above into account, it is considered that paragraphs 6.54 and 6.55 contradict the evidence base.						indicated that whilst some junctions within the Authority are congested, it does not state that the whole road network is at capacity and outlines methods for improvements within the various road networks of Castle Point. Also the Health Impact Assessment (July 2025) outlines that Policy SP4 Development Contributions facilitates contributions to strategic infrastructure and that improving health and wellbeing outcomes for residents and visitors is crucial.	homes delivered in the plan and the health impact assessment considers the contributions to the health and well being of residents to be crucial to deliver the amount of homes within the plan.	
0992-0004	Agent	Timothy	Manana	Hillside Enterprises c/o WSP	Yes	GB1	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Policy GB1 Development sets out that development within the Green Belt will not be supported in line with the NPPF (2024) and that the Council will look to positively preserve the Green Belt. Paragraph 17.12 sets out that development of Grey Belt land is permissible 'where development would not fundamentally undermine the purposes (taken together) of the remaining		No	Not Answered	Yes	B - see additional supporting evidence	The Council has failed to properly assess and identify Green and Grey Belt sites within the draft Local Plan	All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). Development decisions will be informed by consideration of the NPPF in it's	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required	
											Green Belt across the area of the plan, where there is a need for the development proposed, where the site is sustainably located with good access to services and transport choices, and where high levels of affordable housing, infrastructure and open space provision are secured.’ The Council has failed to properly assess and identify Green and Grey Belt sites within the draft Local Plan, and therefore the selection of potential housing allocation sites represents an unsound approach to site selection accordingly. In the withdrawn 2016 and 2019 plans, as well as within the Regulation 18 draft Local Plan, the Council recognised that significant Green Belt releases were required in order to meet its needs. Paragraph 147 of the NPPF (2024) says that Local Authorities should be able to demonstrate the need for development within the review of the Green Belt boundaries and plans should give priority to previously developed land as well as Grey Belt. We would urge Castle Point to reflect on the above to accord with the NPPF (2024).								entireity. The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the	

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																		highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and	

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																		considered wider areas.	
0992-0005	Agent	Timothy	Manana	Hillside Enterprises c/o WSP	Yes	DH2	Yes		No	Justified, Consistent with national policy	Policy DH2 sets out that development will be approved where it does not result in the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements. The Castle Point Borough Green Belt Review (July 2025) refers to Daws Heath, as a village. Furthermore, the Brook Farm Appeal (ref: APP/M1520/W/24/3351658) found that Daws Heath represented a village. The emerging policy seeks to go beyond the requirements of Paragraph 143 of the NPPF (2024) by applying its objectives in a way that would prevent any further development in or around Daws Heath. This approach is particularly restrictive, as it relies on a subjective test of ‘reduction in openness or space’, effectively blocking development irrespective of any demonstrated local need.		No	Not Answered	Yes	B-see additional supporting evidence	The emerging DH2 policy seeks to go beyond the requirements of Paragraph 143 of the NPPF (2024) by applying its objectives in a way that would prevent any further development in or around Daws Heath. This approach is particularly restrictive, as it relies on a subjective test of ‘reduction in openness or space’, effectively blocking development irrespective of any demonstrated local need.	The council consider it necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area to ensure that the gaps between Daws Heath, and other settlements are maintained to protect its unique identity and semi rural character.	N

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0333-0001	Organisation	Andrew	Marsh	Historic England		Had 1	Not Stated	We welcome the commitment to preparing a new Hadleigh Town Centre Master Plan, particularly criterion 7, which aims to create 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 Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU Telephone 01223 582749 historicengland.org.uk Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/privacy centre by focusing on those aspects of their setting	Not Stated			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.					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' We welcome the commitment to preparing a new Hadleigh Town Centre Master Plan, particularly criterion 7, which aims to create an	Modification as follows (bold text additions, strike through deletions). 10.2 Hadleigh Castle (a Scheduled Monument and Grade 1 listed) 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.	Y - 10.2 Hadleigh Castle (a Scheduled Monument and Grade 1 listed) sits to the south of the town centre and dates to Saxon times.

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								which make a positive contribution to their significance.									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.		
0333-0002	Organisation	Andrew	Marsh	Historic England		Had2	Not Stated	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.	Not Stated			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.					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	Y - References to Hadleigh Castle and its setting and environmental assets added to paragraphs a and b (as set out in the Schedule of Mods and Statement of	Y - References to Hadleigh Castle and its setting and environmental assets added to

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																	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.	Common Ground)	paragraphs a and b (as set out in the Schedule of Mods and Statement of Common Ground)
0333-0003	Organisation	Andrew	Marsh	Historic England		DH1	Yes	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.	Yes								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	N
0333-0004	Organisation	Andrew	Marsh	Historic England		D9	Yes	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	Yes			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					We welcome the comprehensive approach taken in Policy D9 to the conservation and enhancement of the historic environment. The	Mods to Policy D9 agreed as set out in the Schedule of Mods and Statement of Common Ground.	Yes - Mods to Policy D9 agreed as set out in the

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								consideration of both designated and non-designated heritage assets, and we are pleased to see reference to key supporting documents and management plans.				expectations for applicants and decision makers. 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. 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.					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 supporting documents and management plans. 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. 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	Hyperlinks added and replacements of 'should' with 'Shall/Must'.	Schedule of Mods and Statement of Common Ground. Hyperlinks added and replacements of 'should' with 'Shall/Must'.

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																	Benfleet Conservation Area Design Code) are included in the online version of the Plan.		
1020-0001	Organisation	Mark	Behrendt	Home Builders Federation	Yes	DTC	No	As the council will be aware paragraph 33a of the Planning and Compulsory Purchase Act 2004 requires the council to engage with the relevant bodies to maximise its actives – one of which is the preparation of development plans. The NPPF reiterates the importance of strategic planning across boundaries and provides further guidance on how to demonstrate compliance, stating in paragraph 26 that Councils should prepare and maintain one or more statements of common ground documenting the cross cutting matters being addressed and progress in cooperating to address these. However, no evidence appears to have been published as to how the Council has met the duty to co-operate. The Council do state in the Housing Capacity Topic Paper that they have had discussion with their neighbouring	No				Yes	Not Answered	Yes	A	Lack of Duty to Cooperate	Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met.	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
								authorities, but without any other detailed evidence the only conclusion that can be reached at pre-sent is that the council have failed in their duty to co-operate.											
0342-0001	Duplicate representation received. See representation 1020-0001 to 1020-0009.																		
1020-0002	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SP1	No		No	Justified, Consistent with national policy	In part 1 of this policy the Council state that in supporting the delivery of the Essex Local Nature Recovery Strategy (LNRS) they will ensure that those areas identified as Strategic Combined Opportunity Areas are safeguarded to deliver additional nature benefits identified to create more connections between habitats areas. While the HBF does not disagree with the principles of identify specific locations where nature recovery can be delivered the Council are using this as a means of preventing new development. What appears to have been ignored by the Council is that the strategic creation opportunities mapped as part of preparing the LNRS	HBF would suggest point 1 of SP1is amended as follows: Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.	Yes	Not Answered	Yes	A	In part 1 of this policy the Council state that in supporting the delivery of the Essex Local Nature Recovery Strategy (LNRS) they will ensure that those areas identified as Strategic Combined Opportunity Areas are safeguarded to deliver additional nature benefits identified to create more connections between habitats areas. While the HBF does not disagree with the principles of identify specific locations where nature recovery can	As set out in paragraphs 6.10 and 6.11, the LNRS identifies the most significant areas of priority habitat across Essex, and identifies those areas where enhancements are necessary to improve the network and deliver an overall gain in nature. The sites identified for protection and enhancement in the LNRS cover a significant extent of the Green Belt in Castle Point. Majority of the	N

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											do not currently have any particular importance with regards nature and biodiversity with LNRS stating on page 30 that “the strategic creation opportunity maps do not contain areas of particular importance for bio-diversity”. These are not areas to be safeguarded but areas where the delivery of biodiversity net gains should be focused in order to maximise the benefits. Rather than being used as a reason for restricting development it will be new development, through the delivery of statutory Biodiversity Net Gains, that will ensure opportunities for nature improvement are delivered in the manner envisioned by the LNRS. The need to balance the provision more homes with nature recovery and other matter is considered in more detail below, however in order to be effective and consistent with the NPPF, HBF would suggest point 1 of SP1is amended as follows: Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing						be delivered the Council are using this as a means of preventing new development. What appears to have been ignored by the Council is that the strategic creation opportunities mapped as part of preparing the LNRS do not currently have any particular importance with regards nature and biodiversity with LNRS stating on page 30 that “the strategic creation opportunity maps do not contain areas of particular importance for bio-diversity”. These are not areas to be safeguarded but areas where the delivery of biodiversity net gains should be focused in order to maximise the benefits. Rather than being used as a reason for restricting development it will be new development, through the delivery of statutory Biodiversity Net Gains, that will	undeveloped areas of the Borough are identified as being a Strategic Combined Opportunity Area, which identify the top locations and opportunities across all habitats. These areas have the greatest potential to deliver benefits for nature and the broader environment. These areas will also benefit from a 15% uplift on standard biodiversity units, as calculated in the biodiversity metric for biodiversity net gain. These areas are critical to the blue and green infrastructure network across the Borough. Policy has been amended to state "protect and enhance" instead of	

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											any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.						ensure opportunities for nature improvement are delivered in the manner envisioned by the LNRS. The need to balance the provision more homes with nature recovery and other matter is considered in more detail below, however in order to be effective and consistent with the NPPF, HBF would suggest point 1 of SP1is amended as follows: Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.	"safeguard" as per ECC reps	

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																	HBF would suggest point 1 of SP1is amended as follows: Supporting the delivery of the Essex Local Nature Recovery Strategy, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the Strategy and focusing any delivery of biodiversity net gains to those areas that hold the greatest potential to deliver benefits for nature.		

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1020-0003	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SP3	No		No	Positively prepared, Justified, Effective, Consistent with national policy	This policy proposes that over the plan period of 2026 to 2043 6,196 new homes will be delivered. This is a capacity based housing requirement and falls short of meeting assessed housing needs by nearly 5,500 homes. The reason for this significant shortfall in supply of new homes is the Council's decision not to amend Green Belt boundaries and focus solely on delivering development in the urban area – and in particular Canvey Island where over half of all new homes are expected to be built. The justification being given by the Council for this approach is to protect the important role played by the Green Belt in Castle Point not only in delivering the purposes of the Green Belt but also in providing green infrastructure both locally and sub-regionally. HBF disagrees with the Council's strategy and does not consider the approach taken by the council with regard to the delivery of development to be consistent with national policy, justified or effective. Our concerns are explored in more detail below. Paragraph 145 of the NPPF states that “once established Green Belt		Yes	Not Answered	Yes	A	Objects to the shortfall in supply of new homes. Objects to the Council's decision not to amend Green Belt boundaries and focus solely on delivering development in the urban area – and in particular Canvey Island where over half of all new homes are expected to be built. HBF disagrees with the Council's strategy and does not consider the approach taken by the council with regard to the delivery of development to be consistent with national policy, justified or effective. Our concerns are explored in more detail below. HBF are also concerned that there has been a lack of any sequential testing of the flood risk with regard to this site and other larger sites in the Green Belt. PPG	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	N

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											boundaries should only be altered in exceptional circumstances”. Paragraph 146 provides more detail on exceptional circumstances stating that they “include but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or development through other means”. Paragraph 146 goes on to say that if that is the case then authorities should review Green Belt boundaries and propose alterations to meet those needs in full unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt. However, before concluding that there are exceptional circumstances the paragraph 147 requires Councils to show that they have made as much use of brown field land as possible, optimised density of development and had discussions with neighbouring authorities to ascertain whether they could meet any other housing needs. Turning first to paragraph 147. The Councils evidence shows that it cannot meet its housing needs in full despite making as much use						states at paragraph 7-023 with regard to the sequential test: NERC Act Requirements and “Strategic Creation Opportunities” Object to the Plan's approach. Protecting public open space: HBF object to the Council's reference to shortfalls in Borough wide open space, as any loss can be mitigated. Sustainable Access:The Council have prepared a Transport Assessment for the urban sites identified in the Castle Point Local Plan. There would appear to be contradictions with the Council's position that it would not be possible to address the impact arising from any of the potential development sites located in the Green Belt. Dispute Housing Capacity Topic	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Sequential and Exception Test for Flood Risk</u> is covered in the SFRA, which will be supported by further clarifications. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments.	

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											of brownfield land as possible. In fact, HBF considers the evidence as to the ability of some of the allocated site to deliver the number of homes suggested to be unjustified – a point we will return to later on in our representations – and adds weight to the need for Green Belt release in Castle Point. As for whether the council has had discussion with neighbouring areas accommodating some of Castle Point’s needs it is difficult to say as no evidence on the duty to co-operate has been provided. Reference is made to the duty in paragraph 3.2 of the Housing Capacity Topic Paper, but this simply states there were discussions on the outcomes of the issues and options consultation. Our assumption is that no offers have been made as nothing is mentioned in the local plan. However, as we mention earlier in these representations the Council will still need to set out what engagement they have had with neighbouring authorities on unmet needs. If no discussion has taken place, then the Council will have failed in its duty to co-operate – an issue that cannot be resolved after the local plan							Papper conclusion that none of the sites provide a critical mass to provide bespoke solutions in the long term and that the sustainable travel measures would not result in a shift to sustainable travel modes.Sugges this contradicts the Transport Assessment Scoping Document: Site specific constraints: Suggest they can be overcome and many green belt sites are preferable to allocated sites in respect of the sequential test. Conclusion on the housing requirement in SP3 HBF considers there to be exceptional circumstances to support amendments being made to Green Belt boundaries in Castle Point and that there are no strong reasons for restricting the overall scale of		

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											has been submitted for examination. It is therefore justified for the Council to review its Green Belt and consider whether exceptional circum-stances exist to support boundary amendments. As has been established there are unmet needs which are considered by the NPPF to be an exceptional circumstance that justifies Green Belt boundary amendments. Therefore, the only remaining consideration with regard to the Green Belt is whether the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt. The Council’s Green Belt Boundary Assessment (GBA) identified 13 sub areas that overall perform either moderately or weakly against the purposes of Green Belt. Further to this the GBA also considered whether any of the parcels could be considered to be grey belt and concludes at paragraph 6.4.1 that 19 of the 31 sub areas assessed could be defined as grey belt. It would appear that the Council agrees with these conclusions in GB2 which states that those						development to the level being proposed by the Council.		

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											sites identified as grey belt in the GBA will not undermine the purposes of Green Belt. As such, the assumption must be that amendments can be made, at the very least at those locations considered to be grey belt, to the Green Belt boundary without fundamentally undermining its purposes. Yet despite this assessment the Council has chosen not to amend Green Belt boundaries due to a range of other issues set out in the Housing Capacity Topic Paper, such as other footnote 7 constraints, biodiversity designations under the NERC Act, flood risk, open space deficit, and heritage considerations. We consider these matters in turn below. Other footnote 7 constraints. HBF accepts that where footnote 7 constraints exist the council should not be placing development in such locations, and these should be excluded from further consideration. However, these designations do not cover all of the development sites in the Green Belt submitted to the Council.								

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											NERC Act Requirements and “Strategic Creation Opportunities” The Council state that as part of the duty to conserve and enhance biodiversity placed on it by the Natural Environment and Rural Communities (NERC) Act 2006, as amended by the Environment Act 2021, requires them to set policies which further the general biodiversity objective and in doing so have regard to the LNRS. In this consideration the Council has made the decision to safeguard all land that has been mapped in the LNRS as being included in the strategic creation opportunity map. The Council state that these areas do not automatically require protection from development. However, the Council goes on to state that they are being safeguarded because they represent the 15% best opportunities for improving nature conservation. This is not correct. The LNRS states on page 30 that these areas “do not contain any areas of particular importance for biodiversity”. What they offer is for every biodiversity unit created in these locations they are eligible								

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											for a 15% uplift in the DEFRA biodiversity metric. As such there is no reason why these sites need to be protected as they are currently of no particular importance in terms of nature or biodiversity, do not need to be protect-ed from development and therefore do not provide a strong reason for not meeting development needs in full. In fact, the counter point to the Council’s argument is that without development there will be less opportunity to make improvements to biodiversity within these locations given that any improvements will principally be as a result of contributions from new development. By supporting more development through amendments to the Green Belt boundary the council would actually be enhancing biodiversity – a key aspect of their duty arising out of the NERC Act. Protecting public open space. The Council consider the existing deficit in open space and on the basis of the golden rules in paragraph 156 of the NPPF that would be perverse to permit development on such spaces. HBF would									

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											agree that it would be inconsistent with paragraph 104 of the NPPF to allow development on public open space where this was not surplus or its loss would not be replaced. However, this is not an absolute constraint as any loss can be mitigated, and it does not affect all of the Green Belt. Therefore, whilst it is an important consideration as to where development might occur it does not prevent Council from amending Green Belt boundaries. The council have also seemingly misinterpreted the golden rules in paragraph 156 of the NPPF. The council set out in section two of the housing constraints topic paper that there is currently a significant deficit in open spaces across the district. This is a legitimate concern. However, rather than see this as a reason for not amending Green Belt boundaries HBF would suggest that the golden rules provide a reason for supporting amendments to the boundary as new development in these areas would ensure that there are more and im-proved open spaces in Castle Point. Sustainable Access									

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											The Council have prepared a Transport Assessment for the urban sites identified in the Castle Point Local Plan. In addition to this the Council have commissioned a site level sustainability and accessibility assessment for each of the Green Belt sites that could potentially be allocated through this local plan. While the results of this study are summarised in chapter 12 of the Housing Capacity Topic Paper, we could not find the study itself in the Council’s evidence. However, looking at the evidence that has been included there would appear to be contradictions with the Council’s position that it would not be possible to address the impact arising from any of the potential development sites located in the Green Belt. The Councils position is set out in paragraph 12.9 of the Housing Capacity Topic Paper. In brief the Council’s conclusion in this paragraph is that none of the sites provide a critical mass to provide bespoke solutions in the long term and that the sustainable travel measures would not result in a shift to								

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											sustainable travel modes. This contrasts with the statement in paragraph 7.2.115 of the Transport Assessment Scoping Document which states with regard to the Green Belt sites submitted through the call for sites (CfS) that: “It is considered that all of the CfS sites have the potential to be brought forward in a manner which would support active and sustainable transport measures and where the local impacts of associated transport demand could be accommodated and/or mitigated”. This would suggest that these sites could address the potential impacts on the highway network arising from their development. Given the significant shortfalls in housing need the Council should have been working proactively with the promoters of these sites and the highways authority to identify solutions that would have enabled these sites to come forward. Therefore, on the basis of the evidence presented there are no strong reasons as to why the Council should not amend Green Belt on the basis of traffic capacity. There is potential to								

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											mitigate the impacts arising from any additional allocations and ensure these sites are sustainable in the long term. Site specific constraints. In addition to the borough wide constraints considered by the Council an assessment has been made as to the site specific constraints such as heritage assets and flooding. However, these issues do not affect all of the sites in the Green Belt being promoted for development and even where they are present it is possible to mitigate an impact arising from these matters. What is most notable with regard to flooding is that the majority of the development proposed by the Council is on Canvey Island which is wholly within Flood Zone 3 compared to the majority of the submitted sites in the Green Belt, being in flood risk zone 1. In terms of the sequential test, it is clear that the sites in the Green Belt should be allocated prior to even considering those on Canvey Island. Conclusion on the housing requirement in SP3 HBF considers there to be exceptional circumstances to support amendments									

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											being made to Green Belt boundaries in Castle Point and that there are no strong reasons for restricting the overall scale of development to the level being proposed by the Council. While there are constraints on development in Castle Point the evidence presented by the Council does not justify adopting the proposed spatial strategy which does not, de-spite the significant shortfall in market and affordable housing, release any land from the Green Belt. The approach taken by the Council fails to take a balanced approach in its consideration of the development needs versus environmental protection, placing significant weight on the latter and giving limited consideration to the benefits of meeting housing needs through the amendment of Green Belt boundary. It is HBFs opinion that the approach set out in SP3 means that the plan is fundamentally unsound. The only way to rectify this is through modifications that amend the Green Belt boundary to support additional locations that will increase the supply of both market and affordable homes. Housing trajectory and								

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											supply The Council have included a delivery trajectory in its Housing Topic paper but not within the Local Plan itself which is not consistent with paragraph 78 of the NPPF which states that “... strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period”. The local pan will therefore need to be modified to include a trajectory. The Council are proposing in policy SP3 to use stepped requirement to reflect the fact that the 70% of the new homes delivered in Castle Point will be built after 2036. This is indicative of the Councils spatial strategy which allocates a number of sites that are not currently available for development, such as allocation C4, and due to their complexity will require considerable work to bring forward. HBF accepts that on the basis of the Council’s proposed spatial strategy a stepped trajectory is probably justified but considers it to be a re-flection of an unsound spatial strategy that fails to take any account of the pressing need for new homes in										

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											Castle Point. As we note earlier in our representations, the need for new homes in Castle Point is not just in the future with housing needs assessment stating that there are currently 3,000 households who cannot afford to rent a home, yet despite this it is proposing that 70% of the homes built will not come forward for over ten years. HBF are also concerned that even the constrained housing supply proposed is not deliverable. In particular we are concerned that allocation C4 West Canvey is expected to deliver 2000 homes between 2036/37 and 2042/43 at an average rate of 250 dwellings per annum. Firstly, it is not clear whether this site is actually available for development on the basis that the assessment in the Strategic Land Availability Assessment (SLAA) from July 2025 states that this is still an unknown. Even if the site is available there are also concerns as to whether the site will deliver 2,000 homes within the plan period. Evidence on average build out rates published by Lichfields in their report Start to Finish show that for sites of this size indicate a								

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											lower quartile build out rate of 100 dpa and an upper quartile rate of 188 dpa. Some sites do build out more quickly but given the evidence on average rates it will be necessary for CPBC to provide evidence as to why they consider it possible for the site to deliver at 250 dpa. Without any further evidence the Council will need to reduce the number of homes that will come forward at West Canvey over the plan period. HBF are also concerned that there has been a lack of any sequential testing of the flood risk with regard to this site and other larger sites in the Green Belt. PPG states at paragraph 7-023 with regard to the sequential test: “The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of								

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											addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, ...” The approach taken by the Council, which discounts Green Belt in lower risk areas has resulted in the majority of development being delivered on Canvey Island in flood zone 3a. HBF would question whether such a strategy is sound and indeed whether it is appropriate to allocate a site such as C4 given that there are alternative sites in lower flood risk areas. While these sites were discounted by the Council, and as such where not part of the sequential test, it is clear that many of the sites in Green Belt that were submitted for development are in lower areas of flood risk. ON the basis of the evidence provided HBF consider it highly likely that this site will nt be delivered within the plan period. If this was the case, then the shortfall in housing land supply would be even more									

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											significant. Housing delivery would be reduced to 4,196 – a shortfall of circa 7,500 homes. HBF have similar concerns with the Manor Trading Estate, which is expected to deliver around 200 homes, yet the Council have no evidence that it is available and state that it is well occupied. In order to be considered developable the site must have a reasonable prospect that it will be available and without any evidence to show it will be available at the point envisaged it should not be included in the local plan. More evidence is needed for this site to be allocated the local plan. 5 year housing land supply Based on the Council’s housing trajectory in the Housing Topic Paper, the Council will not have a five year land supply on adoption. Appendix A of these representations (see attached letter) provide a rolling assessment of the Council’s five year land supply using both the Sedgefield and the Liverpool methods. The assessment includes the requirements for the Council to show a 20% buffer in its housing land								

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											supply as set out in paragraph 78c) of the NPPF. This shows not only that the Council will not have a five year land supply on adoption but for the first six years of the plan period. On the basis of paragraph 11 footnote 8 the plan will be considered out of date from day it is adopted. Conclusion on land supply The Council will not have a five year housing land supply on adoption of this local plan and as such it must be considered unsound. In addition, there is no evidence as to the availability of West Canvey and Manor Estate which together are proposed to deliver 2,200 new homes over the plan period. Unless new evidence can be provided to show that they will be available they should not be allocated.								
1020-0004	Organisation	Mark	Behrendt	Home Builders Federation	Yes	THUN5	No		No	Justified	Both of these policies seek to prevent the intensification of development in these areas. The council acknowledge in paragraphs 11.34 and 12.13 that this is the case but consider it necessary to provide additional protections in the local plan but provide no other justification for these policies. Given that		Yes	Not Answered	Yes	A	Both of these policies seek to prevent the intensification of development in these areas. The council acknowledge in paragraphs 11.34 and 12.13 that this is the case but consider it necessary to	The council considers it necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area	N

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											both of these areas are also designated as Green Belt it is not necessary for there to be additional policies in place with regard the coalescence of settlements. As such they should both be deleted.						provide additional protections in the local plan but provide no other justification for these policies. Given that both of these areas are also designated as Green Belt it is not necessary for there to be additional policies in place with regard the coalescence of settlements. As such they should both be deleted.		
1020-0005	Organisation	Mark	Behrendt	Home Builders Federation	Yes	GB2	No		No	Consistent with national policy	Part b. of this policy sets out the policy position in relation to grey belt and how this will be considered. However, NPPF notes that in the glossary that whilst grey bet can be PDL it is also defined as other land that does not strongly contribute to the purposes a, b or d of paragraph 146. Therefore, it would be appropriate for the title of the policy to be amended to “Grey belt and Previously Developed Land in the Green Belt” to ensure that this is clear. Part b. is also inconsistent with NPPF in stating that land identified as grey belt will not undermine the purposes of including land within the Green Belt. Paragraph 155 of the NPPF	See above	Yes	Not Answered	Yes	A	Part b. of this policy sets out the policy position in relation to grey belt and how this will be considered. However, NPPF notes that in the glossary that whilst grey bet can be PDL it is also defined as other land that does not strongly contribute to the purposes a, b or d of paragraph 146. Therefore, it would be appropriate for the title of the policy to be amended to “Grey belt and Previously Developed Land in the Green Belt” to ensure that this is clear.	The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons,	N

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											states that land is not appropriate where “the development would utilise grey bet and would not fundamentally undermine the purposes taken together of the remaining Green Belt across the plan area”. If a parcel of land is considered to be grey belt, then it is not strongly meeting purposes of a, b or d and the test with regard to it be not inappropriate relates to whether it fundamentally undermines the purposes of green belt across the borough. HBF suggests the policy should be amended to reflect national policy.						Part b. is also inconsistent with NPPF in stating that land identified as grey belt will not undermine the purposes of including land within the Green Belt. Paragraph 155 of the NPPF states that land is not appropriate where “the development would utilise grey bet and would not fundamentally undermine the purposes taken together of the remaining Green Belt across the plan area”. If a parcel of land is considered to be grey belt, then it is not strongly meeting purposes of a, b or d and the test with regard to it be not inappropriate relates to whether it fundamentally undermines the purposes of green belt across the borough. HBF suggests the policy should be amended to reflect national policy.	when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the	

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																		landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2.	

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1020-0006	Organisation	Mark	Behrendt	Home Builders Federation	Yes	ENV 3	No	See comments on DtC and SA	No	Justified, Consistent with national policy	Part 1a of this policy states it will seek to secure nature recovery and biodiversity net gain by “Applying the principles related to the biodiversity hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats”. HBF are concerned that in putting consideration of the biodiversity hierarchy along-side the consideration of irreplaceable habitats the will create confusion in the application of this policy. The delivery of BNG is a separate and different consideration to those related to protected species and habitats and should be kept separate within policies. HBF would therefore recommend that mention of the biodiversity hierarchy is removed from part 1a. HBF does not consider the requirement in 2d for development on greenfield sites to deliver 20% BNG to be sound. Guidance in paragraph 74-006-20240214 of PPG states that: “... plan-makers should not seek a higher percentage		Yes	Not Answered	Yes	A	Part 1a of this policy states it will seek to secure nature recovery and biodiversity net gain by “Applying the principles related to the biodiversity hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats”. HBF are concerned that in putting consideration of the biodiversity hierarchy along-side the consideration of irreplaceable habitats the will create confusion in the application of this policy. The delivery of BNG is a separate and different consideration to those related to protected species and habitats and should be kept separate within policies. HBF	Biodiversity hierarchy comment noted. BNG: As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites The 20% BNG target aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the Local Nature Recovery Strategy for Essex'. 20% is supported by Natural England and the results of the Plan Reg 18 consultation. It has also been subject to viability testing.	N

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											than the statutory objective of 10% bio-diversity net gain, either on an area-wide basis or for specific allocations for development un-less justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented”. As such the starting point is that local plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. There must be very robust evidence that the area is significantly worse than the country as whole with regard to the negative impacts on biodiversity from development. The HBF does not disagree with the broad thrust that the UK has seen a significant loss in biodiversity not just in							would therefore recommend that mention of the biodiversity hierarchy is removed from part 1a.			

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											recent past but previous centuries and as such recognise the importance of ensuring that the outcome of new development in future is that there is a net gain in biodiversity. However, it is important to recognise that in recent years new residential development has not been the driver of declining biodiversity either locally or nationally and in particular over the last 50 years. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), as being “Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK”. Therefore, whilst it is important for development to ensure that it improves the natural environment, it is not the main driver of biodiversity decline in Essex or Castle Point. Given that the Government has stated that plan makers should not seek to apply a higher level of BNG it is clearly insufficient to simply state that a 20% BNG requirement is needed in									

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											CPDC without the evidence to show why new development is having a greater impact on biodiversity in Castle Point compared to other parts of the country. The Council is seeking to require new development to offset the impacts of biodiversity created by the practices of other industries. This is unsound and inconsistent with paragraph 58 of the NPPF and the tests as to when a planning obligation can be sought. Given that 10% net gain is considered by Government as to what is required to address the harm to biodiversity arising from that development there can be no justification for requiring a developer to go beyond that. 43. With regard to viability, the Council's Viability Assessment (VA) states that it has based its cost on the Viability Assessment produced by Essex County Council and assumes the average cost of delivering 10% BNG to be £1000 per dwelling on green field sites and £450 per dwelling on PDL. These have been uplifted by £300 on green field sites to reflect the requirement to deliver 20% BNG. The Viability Assessment shows that on the basis of these costs green field sites can deliver								

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											20% BNG. The difficult with assessments as to the cost of meeting BNG is that every site is different and until the baseline level of biodiversity is known the cost of meeting either 10% or 20% is not known. Therefore, if it is considered to be sound to place this burden on developers there must be scope for this to be reduced where it is a barrier to delivery. HBF therefore suggests that this policy or SP4 on developer contributions is amended to state that where a development is made unviable by the cost of meeting the 20% BNG requirement, on its own or in combination with other costs, this will be reduced to the statutory minimum.								

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1020-0007	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SD4	No	See comments on SA and DtC	No	Justified, Consistent with national policy	The proposed policy position would require all new development to fossil fuel free and demonstrate net zero operational carbon onsite by ensuring energy use standard for all new dwellings of 35kwh/m2/year and space heating demand of less than 15 kwh/m2/year (20 kwh/m2/year for bungalows). This would be demonstrated through an Energy Assessment, which for major applications must be a full energy strategy utilising accurate methods for operational energy use prediction, such as Passivhaus Planning Package (PHPP) or CIBSE TM54. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach		Yes	Not Answered	Yes	A	Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building standards are actually deliverable from the point at which they are	Noted	N

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											that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensures that improvements to building standards are actually deliverable from the point at which they are introduced. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the written ministerial statement (WMS) on local energy efficiency standards published on the 13th of December 2023. Before considering the content of the WMS itself it is important to note the High Court judgement from the 2nd of July 2024 ([2024] EWHC 1693 Admin). This judgement was on the challenge to the WMS made by Rights Community Action on three grounds, including that the WMS restricted exercise by local authorities of powers conferred on them. The judgment made by Justice Lieven was that the claim failed on all three grounds.						introduced. Suggests inconsistency with written ministerial statement (WMS) on local energy efficiency standards published on the 13th of December 2023. HBF does not consider the approach set out in SD4 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. More detailed points provided. HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes. As the council will be aware, some homes, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon		

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											This judgment was then appealed by Rights Community Action on the grounds that the judge erred in her interpretation of s19 of the Environment Act 2021 and s1 of the Planning and Energy Act 2008. Both these were dismissed with the decision notably stating with regard to the second ground of appeal that there was no support for the appellants argument that the WMS unlawfully cuts across the PEA 2008. The WMS is therefore compliant with the intention of Planning and Environment Act 2008 which, whilst allowing LPAs to set standards beyond building regulations, also enables government to establish the approach that should be taken in setting those standards. Local plan policies which seek to apply an alternative approach to setting standards not defined within building regulations, in this case Target Emissions Rates (TER), are therefore inconsistent with the WMS. HBF recognise that LPAs can depart from national policy where justified but as the Council will be aware the WMS must be treated as national policy and as such there is a high bar for departing from the								compared to detached homes and bungalows. As such it may be difficult for some individual homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.		

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											approach it advocates. Moving to the WMS. It states that “Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes” and that local standards can “add further costs to building new homes by adding complexity and undermining economies of scale”. After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures: • That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. • The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). HBF does not consider the									

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											approach set out in SD4 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below. The approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed in the policy position paper and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in								

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											the first place. As such the HBF does not consider the council to be justified in departing from either the WMS or the Planning and Energy Act (2008) and considers the energy use requirements to be deleted from this policy. While HBF do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. In preparing its viability assessment HBF suggests the Council consider costs published by the Future Homes Hub (FHH) as part of their work to support and inform the implementation of the Future Homes Standard. The costs for similar standards to those being proposed can be found in the FHH report ‘Ready for Zero’. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council.									

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											The various specifications and costs considered are summarised in Figure 8 of 'Ready for Zero' and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit. The council's Viability Assessment states at paragraph 5.79 that the costs of achieving its proposed policy to be 6.3% above current regulations for houses and 6.9% for flats. HBF recognise that the specifications are not direct comparison, but it does give an indication as to the potential cost and that the 6-7% increase in built cost proposed by the Council appears low. Given that there is still significant uncertainty as to the cost of delivering the standards being proposed and that much of the development being proposed by the Council will also face high costs site costs given that these are currently in employment and industrial uses the Council will need ensure that further sensitivity testing is undertaken in the viability								

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											study. There is clearly a risk that higher energy efficiency standard such as the ones being proposed could impact on viability and the delivery of allocated sites. With regard to deliverability of zero carbon homes HBF would not disagree that the proposed standards are technically feasible. However, HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period									

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											between current standards and those similar to the Council are proposing that this would "... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes." However, HBF can find no evidence that the Council has considered whether its proposed standard will impact on the rate at which new homes can be built. The Council will need to speak directly to a range of housebuilders operating in Castle Point to understand the impact of its policy on the rate at which homes will be delivered on its allocated sites. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified While HBF understands the desire for LPAs to go further, current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with									

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											paragraph 159b of the NPPF stating that “Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”. If the Council have the evidence to show that the policy is deliverable the Council will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not being designed in the character of the local area. HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes. As the council will be aware, some homes, such as terrace houses and									

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											flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows. As such it may be difficult for some individual homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.								
1020-0008	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SD5	No		No	Justified	As with reducing carbon emissions from operational energy use HBF considers it best that such matters addressed at a national level to avoid different approaches and standard being set in different areas. The housebuilding industry is working with the Future Homes Hub it to develop a roadmap to reducing embodied carbon and		Yes	Not Answered	Yes	A	As with reducing carbon emissions from operational energy use HBF considers it best that such matters addressed at a national level to avoid different approaches and standard being set in different areas. The housebuilding	Noted	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											whilst Council's may want to go further faster HBF have concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers. No evidence has been presented by the Council as to the potential for this to impact on the rate at which new homes are delivered and whether the proposed standard can be achieved on adoption of this local plan. Without evidence from the development industry that these standards can be met, the HBF considers the policy to be unjustified, and that it should be deleted from the local plan.						industry is working with the Future Homes Hub it to develop a roadmap to reducing embodied carbon and whilst Council's may want to go further faster HBF have concerns that this will impact on the deliverability of development with a disproportionate impact on SME developers. No evidence has been presented by the Council as to the potential for this to impact on the rate at which new homes are delivered and whether the proposed standard can be achieved on adoption of this local plan. Without evidence from the development industry that these standards can be met, the HBF considers the policy to be unjustified, and that it should be deleted from the local plan.		

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1020-0009	Organisation	Mark	Behrendt	Home Builders Federation	Yes	SD9	No		No	Justified, Consistent with national policy	Firstly, the lower water standard of 90 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. Future water standards are being considered that will phase the introduction of lower standards and the council should not look to introduce lower standards ahead of these recognising that a consistent national approach is the best way of ensuring improved standards whilst maintaining the delivery of new homes. The only reason for a lower standard would be where the issue of water supply is inhibiting the potential adoption of the local plan and the delivery of new homes. Secondly, the policy states in part 4 that “All new development should demonstrate that adequate foul water treatment and drainage already exist or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development”. It is not the responsibility of the housebuilder to ascertain whether the water		Yes	Not Answered	Yes	A	The lower water standard of 90 l/p/pd is not consistent with national policy which states that 110 l/p/d is sufficient in water stressed areas. Future water standards are being considered that will phase the introduction of lower standards and the council should not look to introduce lower standards ahead of these recognising that a consistent national approach is the best way of ensuring improved standards whilst maintaining the delivery of new homes. The only reason for a lower standard would be where the issue of water supply is inhibiting the potential adoption of the local plan and the delivery of new homes. Secondly, the policy states in part 4 that “All new development should demonstrate that	Noted	N

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											company can service a development by providing the connections required. It is the legal responsibility of the water company to ensure that the requirements of the development plan system can be met. To this end, they are required to publish, by law, every five years a Water Resources Management Plan (WRMP) to ensure just this. This is set out in sections 37A to 37D of the Water Industry Act 1991. This plan is approved by the Environment Agency, and ultimately by Defra. The WRMP cannot be approved unless the water company can provide the assurance that the needs of the development plan system can be supported. To ensure this, the water company must take into account the future development requirements of the local authority. The Government provides more detailed advice about what the WRMP must address in Section 6.3 of the Water Resources Planning Guidance. The Government’s guidance can be read here: https://www.gov.uk/government/publications/water-resources-planning-guideline/water-resources-							adequate foul water treatment and drainage already exist or can be provided in time to serve the development. This must include confirmation that there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development”. It is not the responsibility of the housebuilder to ascertain whether the water company can service a development by providing the connections required. It is the legal responsibility of the water company to ensure that the requirements of the development plan system can be met. To this end, they are required to publish, by law, every five years a Water Resources Management Plan (WRMP) to ensure just this. This is set out in sections 37A to 37D of the Water Industry Act 1991.		

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											planning-guideline. The Government guidance states in Section 1.1 that these plans must forecast water supply and demand over at least the statutory minimum period of 25 years (see Section 1.1). If companies forecast a deficit, they should consider either supply-side options to increase the amount of water available to the water company or demand-side options which reduce the amount of water customers require. Section I of the guidance states with regard to local plans “Local authority plans set out future development, such as housing. Your WRMP should reflect local growth ambitions and plan to meet the additional needs of new businesses and households. (See sub-section 6.3)” with sub-section 6.3 stating: “Your planned property and population forecasts, and resulting supply, must not constrain planned growth. For companies supplying customers in England, you should base your fore-cast population and property figures on local plans published by the local council or unitary authority.” Issues with the inability of													This plan is approved by the Environment Agency, and ultimately by Defra. The WRMP cannot be approved unless the water company can provide the assurance that the needs of the development plan system can be supported. To ensure this, the water company must take into account the future development requirements of the local authority.		

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											water companies to provide connections for new residential development is not a matter for housebuilders to resolve. They cannot. If this is an issue in Castle Point, then it is one that goes to the heart of the deliverability of the local plan. Allocations may be undeliverable. If there is an issue, then the issue must be identified in the Infrastructure Plan by the plan-maker and ideally resolved before then. If the relevant water company cannot guarantee the connections required then this is a serious issue and one that CPBC must raise this with the Environment Agency, not pass on to applicants to resolve. As paragraph 194 of the NPPF states: “The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”								

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0328-0001	Organisation	Sue	Howe	HSE		For word	Not Stated	HSE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area we recommend you contact the Office of Nuclear Regulation. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App https://pa.hsl.gov.uk/ and downloadable GIS consultation zones. These tools alongside HSE's published methodology (https://www.hse.gov.uk/landuseplanning/methodology.htm) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations. Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales. For England: https://www.gov.uk/guidance/hazardous-substances in particular paragraphs 65 to 69 which explain an LPAs responsibilities when taking public safety into account in planning decisions and formulating local plans. For Scotland: https://www.gov.scot/publications/circular-3-2015-planning-	Not Stated	Not Stated						A	HSE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area we recommend you contact the Office of Nuclear Regulation. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App https://pa.hsl.gov.uk/ and downloadable GIS consultation zones. These tools alongside HSE's published methodology (https://www.hse.gov.uk/landuseplanning/methodology.htm) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations. Your attention is drawn to the planning policy guidance provided	Noted	N

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								controlshazardous-substances/pages/2/ Annex F For Wales: https://www.legislation.gov.uk/wsi/2015/1597/contents/made									by your central planning departments in England, Scotland and Wales. For England: https://www.gov.uk/guidance/hazardous-substances-in-particular-paragraphs 65 to 69 which explain an LPAs responsibilities when taking public safety into account in planning decisions and formulating local plans . For Scotland: https://www.gov.scot/publications/circular-3-2015-planning-controlshazardous-substances/pages/2/ Annex F For Wales: https://www.legislation.gov.uk/wsi/2015/1597/contents/made		

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0258-0001	Agent	Lorna	O'Carroll	Iceni OBO Rich borough Commercial	Yes	E1	No	Iceni Projects ("Iceni") have significant concerns in respect of the Castle Point's employment land needs modelling, which do not accurately forecast future needs and significantly underestimate the need for employment land over the plan period. The evidence is also not PPG-compliant which raises significant issues of soundness for the plan. 2. 3. At a regional level, Castle Point holds an important location within South Essex's economic geography. The Borough plays a key role in supporting the supply chain for Basildon's manufacturing and logistics sectors, such as materials and components supplies.	No	Consistent with National Policy	It is therefore concerning that the current approach taken by Castle Point does not take account of the Functional Economic Market Area (FEMA) and seek to support it. 4. These representations are framed in terms of the 'tests of soundness' in paragraph 36 of the NPPF and are supported by a Review of Employment Land Needs Evidence (Iceni, September 2025).	As discussed within this representation, Iceni consider that Castle Point should make the following changes to their draft Local Plan prior to the submission to the Secretary of State: Review the employment evidence base to ensure that it is compliant with the PPG. Changes arising should be reflected in the strategic needs for the Borough, either through a new policy or an updated Policy E2. This review should be undertaken in consultation with adjoining authorities. The wider evidence base should also be reviewed to ensure consistency of approach. 5. • • Update Policy T2 to be consistent with national policy. 2 a. Representations 6. Iceni have been instructed by Richborough Commercial ("Richborough") to provide representations on Castle Point's Regulation 19 Draft Local Plan Consultation. 7. Richborough have an interest in the 'Land west of Canvey Way', which lies within the administrative boundary of Basildon Borough Council, however, it requires access from Canvey Way within Castle Point's administrative boundaries. 8. The Site benefits from a draft allocation, being identified as a "potential site for employment" within the	Yes	Not Stated	Yes	A	<u>Economy and Employment</u> The Council's strategic employment strategy fails to meet the economic development needs of the area and similarly does not consider the implications for the wider South Essex functional economic markets. The Council's evidence base that has informed the development strategy for employment is flawed for the reasons set out within these representations, and therefore the proposed strategy has not taken into account the reasonable alternative. Consistent with national policy – The evidence base being flawed and not PPG compliant demonstrates its inconsistency with national policy. A new policy, or alternatively an updated Policy E2 should be incorporated.	Comments noted. <u>Employment</u> Castle Point's role within a wider South Essex economy is well recognised in the Plan and the development of new floorspace is supported. As set out in the July 2025 Employment Topic Paper - '5.1 The determination of future employment land needs for Castle Point Borough forms a central component of the emerging Local Plan. This process involves a forward-looking assessment of the types and quantities of employment floorspace likely to be required over a 20-year period (2023–2043), with the intention of supporting sustainable economic	N

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												emerging Regulation 18 Basildon Local Plan (ref. E4 Land West of Canvey Way), to contribute towards meeting Basildon Borough Council’s need for “at least 65-82ha of new employment land” over the plan period to 2043.					Castle Point plays an important role in regional economy, but the current approach to employment needs set out by the Plan fails to support economic growth aspirations in neighbouring authorities (i.e. Basildon). A more strategic approach needs to be taken by Castle Point. As demonstrated within the supporting Review of Employment Land Needs Evidence (prepared by the Icení Economics Team, September 2025), we have significant concerns about the Council’s position taken in respect of employment need. Through this, we therefore have fundamental concerns about the soundness of Policy SP3 as being suitable to meet the development need. Dispute findings and conclusions of Transport evidence and the Employment Topic	<i>growth, business investment, and job creation within the Borough. The analysis follows national guidance contained in the National Planning Policy Framework (NPPF, December 2024) and the Planning Practice Guidance (PPG), which require that planning authorities make sufficient provision for commercial development, including for different types of employment use, based on objective and proportionate evidence (see paragraph 2.2). 5.2 The employment land need forecast (–2.02 ha net) indicates that Castle Point already has sufficient land— both designated and permitted—to meet future demand.</i>	

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																	Paper. In response to issues highlighted around Castle Points's economy, new employment development (for example at Canvey Way) will help provide employment opportunities within Castle Point, increasing job density and reducing out-commuting. In addition, new employment development will help support target growth sectors such as advanced manufacturing and green energy, businesses which typically requiring higher-spec modern premises. Logistics and distribution space is also key in supporting the supply-chains of the target growth sectors.	<i>Therefore, the Local Plan's strategy is to optimise and intensify existing employment land, rather than allocating new sites.</i> <i>5.3 To support this assessment, the Council commissioned and adopted the Experian Economic Land Demand Forecast (September 2024). This modelled the future trajectory of employment across a range of land use classes, drawing on demographic trends, sectoral growth assumptions, local economic baselines, and commercial property market benchmarks. '</i>	

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0258-0002	Agent	Lorna	O'Carroll	Iceni OBO Rich borough Commercial	Yes	For word	No	Iceni also have significant concerns that Castle Point's Draft Local Plan fails to demonstrate effective strategic planning across local planning authority boundaries, as required by the National Planning Policy Framework, December 2024 ("NPPF"). There is also a lack of evidence to demonstrate how the Council have met their statutory duty-to-cooperate. Notwithstanding the above, it is also important to consider the importance of cross-boundary planning. Paragraphs 24 and 25 of the NPPF are clear that effective strategic planning plays a vital role in facilitating economic resilience, while joint working is integral to the production of a positively prepared and justified strategy. Paragraph 27 sets out that strategic policy-making authorities should ensure that their policies align as fully as possible including ensuring that any 5 allocation which cuts across the boundary of plan areas or has significant implications for neighbouring areas is appropriately managed by all relevant authorities. Paragraph 36 notes that plans are sound if they are based on effective joint	No	Consistent with National Policy		Make Duty to Cooperate Reports publicly available for review to demonstrate effective cooperation and discharge of the statutory duty.	Yes	Not Stated	Yes	A	Cross-Boundary Working There is no evidence provided that the Council have based their plan on effective joint working on cross-boundary strategic matters. It is not clear that the draft Local Plan or 6 its underpinning evidence base has factored in allocations located on the Borough boundaries including land west of Canvey Way. Plan fails to supportthe Basildon economy.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground.	N

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								working on cross-boundary strategic matters. 24. Even if Castle Point had a surplus of employment land (which we disagree with), Basildon Council's Employment Land Needs Assessment1 (prepared by Lichfields, February 2025) identifies that Basildon should plan for circa 8ha of office uses and a minimum of 61ha of land for industrial and distribution uses for the plan period (2023-2043). 25. Basildon and Castle Point sit at the heart of South Essex's economic geography, and the two economies have a strong interrelationship. Given its proximity and accessibility, Castle Point plays a key role in supporting the supply chain for Basildon's manufacturing and logistics sectors, with SMEs providing goods and services such as materials and components supplies. 26. The current approach taken by Castle Point fails to support the key role that the Borough has in respect of the wider regional economy and similarly fails to support growth aspirations in neighbouring authorities (i.e. Basildon). It is clear that a more strategic approach needs to be taken by Castle Point in the draft Local Plan, i.e. one that acknowledges its											

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								importance for South Essex's economic geography. 27. As a final point, it is noted within the draft Local Plan that the Council refer to having undertaken engagement with neighbouring authorities under the Duty to Cooperate, to explore whether there is potential to help Castle Point meet its housing need (Para 6.57), however this is not raised in respect of employment or commercial need. The draft Local Plan then goes on to refer to the 'Duty to Cooperate Report', however this is not available within the evidence documents. It is essential that this report is made available, so that it can be understood how the Council have approached their responsibilities regarding strategic cross-boundary planning. Without any other detailed evidence, the only conclusion that can be reached at present is that the council have failed in their Duty to Cooperate. Closing – Need and Cross Boundary 28. On the basis of above, Castle Point should therefore review their employment evidence base and changes should be reflected in the strategic needs for the Borough. A new policy should be											

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								implemented, or Policy E2 updated, to permit new employment floorspace in locations other than near town centres. While we challenge the evidence submitted by Castle Point, the NPPF is also clear that planning policies should be flexible enough to accommodate needs not anticipated in the plan (paragraph 86e), which the current policies also fail to do so. 29. Any review should be undertaken in consultation with Basildon, and other Local Authorities in the FEMA. 30. To summarise, the Council fails the tests of soundness as follows: a. Positively prepared – The Council’s strategic employment strategy fails to meet the economic development needs of the area and similarly does not consider the implications for the wider South Essex functional economic markets. b. Justified – The Council’s evidence base that has informed the development strategy for employment is flawed for the reasons set out within these representations, and therefore the proposed strategy has not taken into account the reasonable alternative. c. Effective – There is no evidence provided that the Council											

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								have based their plan on effective joint working on cross-boundary strategic matters. It is not clear that the draft Local Plan or its underpinning evidence base has factored in allocations located on the Borough boundaries including land west of Canvey Way. d. Consistent with national policy – The evidence base being flawed and not PPG compliant demonstrates its inconsistency with national policy. Other comments 31. The current wording of Policy T2 (Criterion 7) is not consistent with national policy, and therefore there are soundness issues with the policy as written. The Policy states “7. The Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions.” 32. National policy however sets a higher barrier in respect of transport impact, which the Council’s draft policy does not reflect. Paragraph 166 of the NPPF is clear that ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road											

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								network, following mitigation, would be severe, taking into account all reasonable future scenarios.' 33. A more suitably worded policy would be "The Council will resist development that would result in an unacceptable impact on the safety of A13, A127 or A130, or associated junctions. Following mitigation, the Council will resist development where the residual cumulative impacts on the effective operation and resilience of the roads named above would be severe, taking into account all reasonable future scenarios." In conclusion, further work should be undertaken by Castle Point prior to the submission of the draft Local Plan to the Secretary of State to review the evidence base, with a focus on the employment evidence in particular, and changes should therefore be reflected in the strategic needs for the Borough. A new policy, or alternatively an updated Policy E2 should be incorporated. 35. Castle Point plays an important role in regional economy, but the current approach to employment needs set out by the Plan fails to support economic growth aspirations in											

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								neighbouring authorities (i.e. Basildon). A more strategic approach needs to be taken by Castle Point. 36. These amendments are considered necessary to ensure that the draft Local Plan is sound and compliant with national policy.											

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0258-0003	Agent	Lorna	O'Carroll	Iceni OBO Rich borough Commercial	Yes	T2	No		No	Positively prepared,	The key consideration in assessing the draft Local Plan is NPPF paragraph 36 and the tests of soundness which require them to be: “a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.” 13. Iceni consider the approach taken by Castle Point in the preparation of the draft Local Plan, in respect of		Yes	Not Stated	Yes	A	Highways Impacts The current wording of Policy T2 (Criterion 7) is not consistent with national policy, and therefore there are soundness issues with the policy as written. The Policy states “7. The Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions.” National policy however sets a higher barrier in respect of transport impact, which the Council’s draft policy does not reflect. Paragraph 166 of the NPPF is clear that ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would	Highways Impacts Transport policies supported by evidence and engagement with the Highways Authority.	N

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											planning for employment needs fails on all four tests of soundness. Economic Development Need 14. It is noted within Policy SP3 ‘Meeting Development Needs’ that the Council have not included any new employment land within the policy, i.e. that no additional land is required to meet employment needs over the plan period. Instead, the Plan applies a ‘no net loss’ principle, coupled with strategic opportunities to safeguard, modernise and intensify the four Strategic Employment Areas, rather than allocate any new sites (Policy E1). 4 15. As demonstrated within the supporting Review of Employment Land Needs Evidence (prepared by the Icen Economics Team, September 2025), we have significant concerns about the Council’s position taken in respect of employment need. Through this, we therefore have fundamental concerns about the soundness of Policy SP3 as being suitable to meet the development needs in Castle Point and whether the draft local plan can be considered to be positively prepared or justified. We understand Castle Point have identified a surplus of employment uses over the plan period (Paragraph 6.36								be severe, taking into account all reasonable future scenarios.‘ A more suitably worded policy would be “The Council will resist development that would result in an unacceptable impact on the safety of A13, A127 or A130, or associated junctions. Following mitigation, the Council will resist development where the residual cumulative impacts on the effective operation and resilience of the roads named above would be severe, taking into account all reasonable future scenarios.”		

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											– 6.40). It is contended that the extant permission is already committed development and therefore this overinflates the stated surplus of employment land. The Employment Land Need forecast for 2023-2043 (included within the Employment Topic Paper, July 2025) identifies a net negative requirement of B-class employment land leaving a surplus of 2ha. When combined with an extant permission at West Canvey, the Council’s position is that this could result in a surplus of 9.5ha of land supply. 17. Paragraph 15 and 16 of the NPPF are clear that plans should, amongst other things, address economic needs and contribute to the achievement of sustainable development. Paragraph 86(a) further states that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. 18. It is clear, in light of the evidence, that at the moment Castle Point have failed to do this. 19. The evidence relied on by the Council is not considered to be sound, and Icen consider that the Council have underestimated their need. As such, the plan is								

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											not positive prepared. Notably, the Employment Topic Paper (July 2025) fails to be PPG compliant through an absence of any commercial market analysis exploring office and industrial market dynamics meaning that it is not fully justified or consistent with national policy. 20. Through analysis undertaken by Iceni, the employment need in Castle Point Borough is considered to be 11.9ha over the 2023-43 plan period, a significant increase in the evidence put forward by the Council. This has been calculated using a PPG compliant approach of alternative employment needs modelling, which is set out within the Iceni Employment Review. 21. With the failure to allocate any new sites and the actual employment need of 11.9ha, there are further ramifications in respect of the soundness of the plan. The transport evidence has been undertaken on the basis that no new employment sites will be allocated, and clearly this is flawed. The evidence base concerning transport should be updated to reflect the accurate levels of employment growth during the plan period. In the round, it is expected that transport evidence for								

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											the Castle Point draft Local Plan will take account of identified growth in the Basildon draft Local Plan, and other local planning authorities in South Essex, recognising shared connectivity and the likely impacts of growth. The draft Local Plan is not based on an appropriate strategy and therefore cannot be considered to be justified. 22. There are further concerns raised by the Icen Economics Team. For example, the alleged intensification through vertical expansion will not provide space for new occupiers, and whilst it will allow existing businesses to grow their premises, this is unlikely to generate job creation and will more likely provide additional floorspace for storage or machinery only. Furthermore, due to the age of Castle Point’s industrial stock, comprehensive redevelopment will likely be required to meet modern requirements, which might not be viable for single units. The fragmented plot patterns of the existing industrial areas are noted by the Council, and this could therefore be a barrier to redevelopment.								

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0332-0001	Agent	Corin	Williams	Iceni OBO The Inner London Group		SP3	No	Draft Policy SP3 sets out the overall levels of growth being planned for in the new Local Plan. It identifies a requirement to deliver a minimum of 6,196 net additional dwellings and 0 ha of employment land over the Plan period to 2043. The Spatial Strategy seeks to deliver the majority of homes in the later part of the plan period, aiming to bring forward a brownfield register for sites, development masterplans for town centre sites and renew designated employment sites with a mix of uses comprising housing, industrial and commercial uses in accordance with relevant policies. 2.3 Whilst Inner London support the intentions of Policy SP3 to “support development needs” across the plan period, the objectively assessed housing and employment need targets are far below what is required and expected by national policy. As it stands, the draft plan only seeks to address 52% of the housing need calculated for the borough by the new Standard Method, with the supporting evidence providing insufficient reasons as to why a population of nearly 90,000 people will generate									B	Promoting Site GB3 <u>Policy SP3</u> The objectively assessed housing and employment need targets are far below what is required and expected by national policy. Considers that the most effective way to retain jobs in the borough is to create more opportunities for employment growth and as such consider that Policy SP3 should be amended to clearly identify what the employment land target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use). Inner London also object to the assertion in the supporting text that there will be a surplus of employment land, particularly industrial land over the plan period. <u>SA</u> Suggest there are significant inaccuracies and	<u>Policy SP3</u> Employment land requirements are stated in paragrapgh 6.36 'In terms of employment need, data on employment growth indicates that there will be a small surplus of employment land arising over the Plan period of circa 2ha. This is additional to 7.5ha of land that has extant planning consent for employment uses at West Canvey. This means there is a potential surplus of 9.5ha of employment land over the Plan period.' So it is not necessary to identify targets by employment use in the policy. <u>SA</u> Grey Belt is implicitly recognised in option 2a in it's title 'Release a limited number of approximately	N

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								a 0ha employment need over the next 20 years. 2.4 Paragraph 3.9 of the draft plan states that the current value of the local economy is around £1.1bn. This equates to a GVA of around £20,500 per working age person which the plan highlights is “significantly below the Essex and national averages”. Paragraph 3.11 also states that despite the high work participation percentage of 87.9%, the commuter ratio stands at 54% meaning that most people need to commute outside the borough to secure higher wages which can be obtained elsewhere within the Southend and Brentwood Travel-to-Work Area. 2.5 Inner London consider that the most effective way to retain jobs in the borough is to create more opportunities for employment growth and as such consider that Policy SP3 should be amended to clearly identify what the employment land target is for different types of employment use (e.g. office use, general industrial use, storage and distribution use). Greater clarity is also required on how the council will “ensure that there is sufficient employment land and commercial									shortcomings in the evidence base used by the Council to inform the Local Plan development targets. As a result, the Sustainability Appraisal and its judgements on the relative merits of different development options are based on flawed and outdated data. This undermines the credibility of the Appraisal’s conclusions and means the Local Plan cannot be considered justified or supported by a robust evidence base, as required by the NPPF. It is considered that in assessing Option 2a, the SA has given insufficient weight to the benefits of and the need to deliver new housing and employment growth. The SA also fails to appreciate that Grey Belt sites are, by definition, of a lower environmental / ecological quality than Green Belt sites by virtue of	5 Green/Grey Belt sites'. The explicit reference to grey belt distinguishes it from options 1, 3 and 4. The respondents' preference for option 2a is noted.	

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								floorspace” without having an employment floorspace target against which delivery can be measured. For this reason, the plan cannot be considered positively prepared and in line with national policy. 2.6 Inner London also object to the assertion in the supporting text that there will be a surplus of employment land, particularly industrial land over the plan period. Paragraph 6.36 states that “data 4 on employment growth indicates that there will be a small surplus of employment land arising over the plan period of circa 2ha and that this, added to the extant planning consent for a 7.5ha employment scheme at West Canvey, has the potential to result in an overall surplus of 9.5ha of employment land over the plan period”. 2.7 Contrary to the findings of the Local Plan Evidence, Icení’s review local commercial property market dynamics (attached at Appendix A) reveals a critical shortage of industrial space in Castle Point rather than a surplus. It finds that, as of September 2025, the industrial vacancy rate in Castle Point is a very low										Footnote 7 of the NPPF which does not allow parcels to be classified as Grey Belt if its constraints provide a “strong reason for refusing the development proposed” (Para 11d (i) NPPF 2024). Given the more limited constraints associated with Grey Belt land, it is considered that any potential environmental impacts can be effectively mitigated via S106 contributions. The exclusive reliance on brownfield land within Option 1 delivers only half of the borough’s housing requirement and is founded on flawed and outdated evidence. By contrast, Option 2a offers a more balanced and deliverable strategy, enabling the release of limited Grey Belt sites (such as Land South of Charfleets) that are less		

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								1.7% which is significantly below Essex (7.0%) and the UK (5.5%). An optimal vacancy rate for a healthy industrial market is typically 5-10% to allow for market churn and business expansion. 2.8 This low vacancy rate indicates high demand for industrial floorspace in Castle Point and suggests that that current and previous market activity has been suppressed due to a lack of supply, a trend that has persisted historically, except for a brief rise in 2023. Currently, there are only 8 available industrial properties across the district, totalling 4,800 sq.m., with a majority being pre-1985 and unlikely to meet modern occupier requirements. There is a distinct lack of modern stock, especially for mid-sized businesses, with only one modern unit built in 2020 at Amber Industrial Park. The Thamesview 130 development is close to completing and is nearly fully let – showing that more modern employment space within the borough is in demand. 2.9 Based on a 10-year trend of average industrial net absorption, Iceni's analysis suggests an industrial need of 11.9ha for Castle Point for the								environmentally constrained, well-related to the borough's most sustainable settlement, and capable of accommodating both housing and employment growth.			

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								2023-43 period, including a 5-year buffer, contrasting sharply with the draft Local Plan's projected surplus. 2.10 The economics note concludes that the Employment Topic Paper's reliance on a baseline labour demand model alone has likely significantly underestimated the need for employment floorspace, particularly for industrial uses, and therefore is neither justified or positively prepared as per paragraph 36 of the NPPF. It states that planning for additional modern business space, which is sustainable and capable of accommodating automation and modern business needs, is crucial for economic growth and diversification in Castle Point and that the current stock restricts inward investment and, by extension, the economic prospects of the wider authority and its residents.											
0344-0001	Duplicate representation received. See representation 0271-0001.																		
0345-	Individual	Alan	Jackson			Whole					I believe the plan has been legally prepared and sound. Alan Jackson 16						The plan has been prepared legally and soundly	Noted	N

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0001						Plan					Pendlestone Benfleet SS7 1RT								
0346-0001	Individual	Christine	Rands			SP3					For the attention of: CPBC Planning department Policy reference/name: SP3 / C4 Page number: 25-26 / 40-41 Paragraph number: 6.32-6.35 / 8.33-8.40 Dear Sir/Madam, This is my own personal response to the Castle Point Plan Regulation 19 Draft consultation. I consider the Castle Point Plan Regulation 19 Draft to not be legally compliant, as it has failed to consider strategic alternatives like North West Thundersley and it has no credible five-year housing land supply. I consider the Castle Point Plan Regulation 19 Draft to be unsound. It fails the tests of soundness, justified and consistent with national policy. It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a 'no Greenbelt build policy', it is solely based on the 'over development of Brownfield sites', has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of					A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • North West Thundersley should have been included. • SA - NW Thundersley not adequately assessed. • Canvey: Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites. • Charfleets: Objects to inclusion of residential and lack of engagement,	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • Strategic Alternatives: Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Flooding and infrastructure	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the

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											the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island’s unique geography and drainage infrastructure, the proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures. The inclusion of the Charfleets Industrial estate as a brownfield site for development into a mixed use housing and industrial area has not fully considered the impact on micro, small, medium and large businesses currently operating on the estate that are currently renting property or own their own site, there is no assessment of how they will be able to operationally or financially continue to operate, should they be forced to move to new premises or have restrictions placed on their existing operations in the future, due to the proximity of new residential properties. This policy is not evidence based, as I believe there has been poor engagement verging on negligent engagement, and								covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered through the the SFRA. • Charfleets: Charfleets Industrial Estate is included within Policy E1 which includes the statement ' the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other ‘sui generis’ uses of a similar employment nature unless it can be demonstrated that there is no	Castle Point Strategic Flood Risk Assessment (SFRA).

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											officers have not engaged with the majority of the businesses on the Charfleets Industrial estate. The future plans for Charfleets Industrial estate needs a fully supported, full economic regeneration of the estate, and there is no reasoned justification for using the Charfleets Industrial estate for housing, with businesses integrated with residential homes. The access roads onto Canvey Island are not sufficient at the present time. A further road(s) must be a priority in order to even consider further housing on the Island. Most of the roads around the Island are also not standard width which causes problems navigating the area. Consideration as to how the Island’s roads would cope with the copious amount of building traffic that would need to access the Island would need to be a further priority. The following modifications are necessary to make the Castle Point Plan Regulation 19 Draft legally compliant and sound. Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with													reasonable prospect for the site to be used for these purposes	

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											Canvey at 1050. Remove Charfleets Industrial Estate site from the plan. Total housing target of 11,000. Note, I do not wish to participate at the oral examination. I am happy that my name will be published alongside my comments to the Castle Point Plan Regulation 19 consultation. Please acknowledge receipt of my submission. Kind regards Christine Rands 14 Chapman Road Canvey Island SS8 7QS								
0347-0001	Individual	Diane	Gray			Whole Plan	Yes	Kindly note that I believe the plan has been legally prepared and sound.	Yes								Castle Point Plan is sound and legally compliant,	Support Noted	N
0348-0001	Individual	Debbie	Collins			Had 4	Not Stated	My objections is the volume of the numbers homes and the number of habitable rooms on this site. Traffic in Scrub Lane is already congested during school pick up and drop off times. The development will increase traffic volume generally in the road. How will the current school be able to accommodate the additional number of children?	Not Stated								Policy Had 4. Objects to proposed development number of habitable rooms. Will cause traffic congestion. Concern over availability of school places.	Infrastructure: Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Highways Impacts: The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	N

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0332-0002	Agent	Corin	Williams	Iceni OBO The Inner London Group		E1	No	Inner London agree with the general principles of Policy E1 and E2 which seek to increase jobs by increasing the amount of high-quality employment space within the Borough but disagree with the soundness of the approach which focuses new commercial provision exclusively towards existing employment designations and town centre sites. 2.18 Paragraph 14.10 of the supporting text confirms that these policies have been based on the findings of the Experian Economic Demand forecast for Castle Point September 2024 which states that “there is a net demand of 4,000m2 of additional office floorspace in the Borough, but a small shrinkage in the demand for new land for industrial uses and warehousing growth is negligible”. As established by the Iceni Economic Note, these figures are based upon a baseline labour demand model which has significantly underestimated the need for employment space within the Borough, particularly for industrial uses, and that the Council should be planning for a minimum of 11.9ha of employment space over the plan period to meet needs. 2.19 Given the flaws in the supporting evidence, the			Whist Inner London understand that the Council seek to improve these areas, there is no consideration as to where the current occupants will move to whilst the employment areas are being redeveloped. The Iceni Economic Note finds that this has been compounded by the fact that “no allowance has been made for replacement demand which considers the replacement of stock lost to other uses and the need to replace aging stock. Industrial and warehousing stock typically have a lifecycle of 30-40 years and so an allowance should be made to replace a proportion of pre-2000s stock which will become obsolete during the course of Plan Period.”. It stands to reason that the Council will need to “decant” existing occupiers to free up for redevelopment meaning that additional 7 floorspace will be required. By having a 0ha employment need over the next 17 years, the council is not planning for this identified need and as a result is not positively prepared and is therefore unsound.	Inner London request that the employment need is recalculated and that a separate policy be added to guide the development of land that is outside existing employment areas or town centres.				B	<u>Policies E1 and E2</u> Agree with the general principles of Policy E1 and E2 which seek to increase jobs by increasing the amount of high-quality employment space within the Borough but disagree with the soundness of the approach which focuses new commercial provision exclusively towards existing employment designations and town centre sites. The supporting text confirms that these policies have been based on the findings of the Experian Economic Demand forecast for Castle Point September 2024 which states that “there is a net demand of 4,000m2 of additional office floorspace in the Borough, but a small shrinkage in the demand for new land for industrial uses and warehousing growth is	Policies E1 and E2 Noted As set out in paragraph 14.14 'A review of the Borough's stock of employment land was undertaken in the Economic Sites Review 2024 to identify what opportunities exist to increase economic productivity. It identified that there are three principal sites that constitute the current and potential future strategic employment land supply: • Charfleets Trading Estate is a large set of industrial estates in the west of Canvey Island. This area is currently growing, and there is further potential for investment in the site which could drive intensification, increasing	N

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								Council needs to reassess whether it is a realistic prospect to accommodate 11.9ha employment demand within the existing employment areas (namely, Charfleets Trading Estate, Manor Trading Estate and Stadium Way). Paragraph 14.15 of the plan recognises the current condition of these areas stating that “At present the Borough’s Strategic Employment Areas are well occupied, but of generally poor quality in terms of environment. The building stock is generally poor, except for new development to the south of Roscommon Way (the Inner London development)”. A further review of these sites has found them to be densely packed and comprised mostly of small units with limited yard / parking space. Taking in respect of the Borough-wide available supply, the Icen Economics Note states that “there is just one modern unit built in 2020 at Amber Industrial Park. Overall, there is a distinct lack of modern stock available in Castle Point. There are no options for mid-size businesses looking to move”.									negligible”. As established by the Icen Economic Note (attached separately), these figures are based upon a baseline labour demand model which has significantly underestimated the need for employment space within the Borough, particularly for industrial uses, and that the Council should be planning for a minimum of 11.9ha of employment space over the plan period to meet needs The Council needs to reassess whether it is a realistic prospect to accommodate 11.9ha employment demand within the existing employment areas (namely, Charfleets Trading Estate, Manor Trading Estate and Stadium Way). Roscommon Way, Canvey Island Review of Employment Land	floorspace and jobs across the area. • Manor Trading Estate is a large industrial site in north Benfleet. There is high occupancy on the site, despite relatively poor infrastructure, notably the access to and around the site. • Stadium Way, Rayleigh Weir, is a smaller industrial estate with excellent occupation rates and limited opportunity for intensification. '	

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																	Needs evidence attached separately		
0350-0001	Duplicate representation received. See representation 0278-0001.																		
0351-0001	Individual	Jade	Day			SP3	No	Dear Sir/Madam, I DO NOT support the Castle Point Plan Regulation 19 Draft Consultation. I DO NOT consider the draft plan to be legally compliant. Reason: It fails to consider strategic alternatives like North West Thundersley. It has no credible five-year housing land supply.	No	Justified, consistent with national policy	I DO NOT consider the draft plan to be sound. Reason: The draft local plan is not justified and consistent with national policy. It doesn't meet the housing target for Castle Point. The site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. The draft local plan is not justified. The selection strategy is biased and predetermined towards a 'no greenbelt build policy'. The site selection is based on the 'over development of Brownfield sites'. Not all sites have been considered. No Greenbelt / Grey Belt	PROPOSED MODIFICATION: Add North West Thundersley site.				A	Objections on: • 5 Year housing supply - Not identified as required under NPPF 78. • Duty to Cooperate - Absence of clear and binding agreements on cross-boundary infrastructure and housing distribution. • North West Thundersley should have been included. • Canvey:	• Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. • Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground • North West Thundersley :	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances,

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											sites added, specifically with the exclusion of North West Thundersley. NPPF guidelines state that development should be directed away from areas at highest risk of flooding. Sustainable Drainage measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. The 3,316+ urban homes for Canvey is not resident led						Concerns over flood risk. SUDS must be designed with a full understanding of Canvey's unique drainage context. • Green Belt: Welcome decision not to include green belt sites.	Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred (also see SOCG between CP and ECC set out the reasons site not currently a preferred alternative for allocation) and also the August 2025 North West Thundersley transport evidence. • Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options also have been considered	landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		through the the SFRA.	
0351-0002	Individual	Jade	Day			C4	No	. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Not Stated							A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0332-0003	Agent	Corin	Williams	Iceni OBO The Inner London Group		GB1	No	Inner London object to Policy GB1 on the grounds that it is not consistent with national policy is therefore unsound in accordance with Paragraph 36(d) of the NPPF. Point 1 of the policy states that “Development with the Green Belt, as defined on the policies map, will not be supported in line with the NPPF”. This is an inaccurate reading of national policy which actually states that development in the Green Belt is inappropriate unless one of the exceptions outlines in paragraph 154 applies.	No	Consistent with National Policy	Policy GB1 fails to acknowledge the differences between inappropriate and not inappropriate development in the Green Belt and the fact that when development is proposed which is inappropriate, it will not be permitted except where a Very Special Circumstances case is demonstrated. Another way in which development can be regarded as not inappropriate in the Green Belt is if it is located on land which meets the definitions of Grey Belt and the criteria set out at NPPF Paragraph 155. Again, there is no reference to Grey Belt land in this policy, only in the supporting text, where a short description of NPPF Paragraph 155 is provided. 2.24 Castle Point is					B	<u>Policy GB1 – Development affecting the Green Belt</u> Object to Policy GB1 on the grounds that it is not consistent with national policy is therefore unsound in accordance with Paragraph 36(d) of the NPPF. Point 1 of the policy states that “Development with the Green Belt, as defined on the policies map, will not be supported in line with the NPPF”. This is an inaccurate reading of national policy which actually states that development in the Green Belt is	Grey Belt assessment of Land south of Charfleets noted. Policy GB1 – Development affecting the Green Belt Development decisions will be informed by consideration of the NPPF in it's entirety. The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review,	N

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											required to review the Green Belt as part of the Local Plan process and identify exceptional circumstances which justify changes to Green Belt boundaries (Paragraph 147 of the NPPF). Paragraph 146 of the NPPF states that Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means [emphasis added]. As has been established by this response and its supporting Appendices, there is a proven shortfall between the council's identified housing need and the target set out in the draft plan of 5,721 and an anticipated shortfall of 11.9ha of employment land – established by Appendix A. 2.25 Policy GB1 needs to be amended to clearly explain that this protection should only be extended to land which contributes strongly to purposes (a), (b) and (d) as set out in Paragraph 143 of the NPPF. As outlined in the introduction of these representations, the Land South of Charfleets site (Parcel GB3 / Site 39926) was assessed by the latest Green Belt Assessment to make a weak / moderate						inappropriate unless one of the exceptions outlines in paragraph 154 applies. Grey Belt assessment of Land south of Charfleets attached seperately.	backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of	

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											contribution to purpose (a), a weak contribution to purpose (b) and a moderate contribution to purpose (c). As such, the site is listed in Table 12 of the Green Belt Assessment as being “potential Grey Belt upon consideration of Green Belt purposes a) and b)” which makes it a prime candidate to be released for development in terms of having an impact on the wider Green Belt. Iceni has undertaken a full Grey Belt Review of the site which speaks to these points and is attached at Appendix B. Policy GB1 fails to recognise that Green Belt parcels can vary in terms of their contributions and appropriateness for development, instead stating that all development on Green Belt, regardless of its assessment in the Green Belt Review, is inappropriate. In doing this it does not align with national policy and therefore must be found unsound.							additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. 2018 Green Belt Assessments still form part of the evidence and considered wider areas.	
0332-0004	Agent	Corin	Williams	Iceni OBO The Inner London Group		ENV1	No	Inner London support the broad intentions of policy ENV1, especially the aims for all development to contribute positively towards creating a visually attractive environment. Point 2 however, which requires all development proposals to “seek to	No	Positively Prepared	The majority of proposals are already required to provide a 10% Biodiversity net gain enhancement, a figure that the Council seeks to increase to 20% in draft policy ENV3. Requiring all developments to make enhancements to key natural / semi – natural and					B	Policy ENV1 – Protecting and Enhancing the Landscape and Landscape Features nner London support the broad intentions of policy ENV1, especially	The Plan accords with the NPPF overarching objectives, including to 'Protect and enhance our natural, built and historic environment'	N

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								protect and enhance key natural / semi-natural and historical features” is considered to put an unnecessary burden on developments and should only be required where feasible.			historical features as well as provide a 20% uplift to biodiversity is considered unreasonable and should only be required where feasible. As such, the existing policy is likely to discourage development by unduly impacting their viability and deliverability and therefore cannot be considered positively prepared or sound in accordance with the NPPF.						the aims for all development to contribute positively towards creating a visually attractive environment. Point 2 however, which requires all development proposals to “seek to protect and enhance key natural / semi-natural and historical features” is considered to put an unnecessary burden on developments and should only be required where feasible. The majority of proposals are already required to provide a 10% Biodiversity net gain enhancement, a figure that the Council seeks to increase to 20% in draft policy ENV3. Requiring all developments to make enhancements to key natural / semi – natural and historical features as well as provide a 20% uplift to biodiversity is	(NPPF 8c). NPPF paragraph 20 is clear that strategic policies should ensure 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure' and paragraph 136 is clear that existing trees should be retained wherever possible. Public authorities have a legal duty under the Environment Act 2021 to consider what they can do to conserve and enhance biodiversity as part of their decision-making. This includes both protecting existing features and working to improve their condition. In line with national policy, statutory bodies	

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																	considered unreasonable and should only be required where feasible. As such, the existing policy is likely to discourage development by unduly impacting their viability and deliverability and therefore cannot be considered positively prepared or sound in accordance with the NPPF	emphahsise the retention, conservation, and enhancement of existing and historic features.	
0332-0005	Agent	Corin	Williams	Iceni OBO The Inner London Group		ENV3	No	Similarly to the response to Policy ENV1, Policy ENV3 and its requirement for greenfield developments to deliver a 20% biodiversity uplift is considered to put a significant strain on the deliverability of schemes and will inevitably stop them coming forward.	No	Positively Prepared	Inner London would like to ask when evidence justifying this position will be published and whether this option has been fully viability tested. Without this supporting evidence the policy is unsound on the ground of it stifling development and therefore not being positively prepared.					B	<u>Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain</u> Similarly to the response to Policy ENV1, Policy ENV3 and its requirement for greenfield developments to deliver a 20% biodiversity uplift is considered to put a significant strain on the deliverability of schemes and will inevitably stop them coming forward. Inner London would like to ask when evidence justifying this position will be published and	As set out in paragraph 18.29 'Local areas can set a higher requirement through their plans where it can be demonstrated it would be deliverable. Viability testing has indicated it is possible to secure 20% biodiversity net gain on greenfield sites, and this requirement has been set for those sites to improve local contribution to the local Nature	N

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																	whether this option has been fully viability tested. Without this supporting evidence the policy is unsound on the ground of it stifling development and therefore not being positively prepared.	Recovery network identified through the Local Nature Recovery Strategy for Essex'.	
0332-0006	Agent	Corin	Williams	Iceni OBO The Inner London Group		T2		Policy T2 confirms that transport and highways improvements will be delivered in line with the Infrastructure Delivery Plan (IDP) 2025. The IDP is a critical document as it models three potential growth scenarios, ranging from development limited to the urban area (Scenario 1) to options which consider a broader distribution of sites informed by the emerging Green Belt Review (Scenarios 2 and 3). Importantly, the IDP acknowledges that the infrastructure measures needed to support higher levels of growth have been identified, meaning that growth in excess of that currently planned for is not only feasible but could be supported in transport terms.				On this basis, Inner London request that Scenario 2, which reflects development across both urban brownfield and a limited number of Green Belt / Grey Belt sites, is fully reviewed in parallel with Option 2a for Policy SP3 within the Sustainability Appraisal. Scenario 2 represents a balanced and deliverable approach to meeting a greater share of the borough's objectively assessed housing and employment needs while ensuring that transport infrastructure planning is aligned to accommodate such growth.				B	<u>Policy T2 – Highway Improvements</u> Policy T2 confirms that transport and highways improvements will be delivered in line with the Infrastructure Delivery Plan (IDP) 2025. The IDP is a critical document as it models three potential growth scenarios, ranging from development limited to the urban area (Scenario 1) to options which consider a broader distribution of sites informed by the emerging Green Belt Review (Scenarios 2 and 3). Importantly, the IDP acknowledges that the infrastructure measures needed to support higher levels of growth have been	Preference noted	N

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																	identified, meaning that growth in excess of that currently planned for is not only feasible but could be supported in transport terms. On this basis, Inner London request that Scenario 2, which reflects development across both urban brownfield and a limited number of Green Belt / Grey Belt sites, is fully reviewed in parallel with Option 2a for Policy SP3 within the Sustainability Appraisal. Scenario 2 represents a balanced and deliverable approach to meeting a greater share of the borough's objectively assessed housing and employment needs while ensuring that transport infrastructure planning is aligned to accommodate such growth.		

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
033 2-000 7	Agent	Cor in	Willi ams	Iceni OBO The Inner Lond on Grou p		C4					2.3 Inner London agrees with the broad intentions of the draft policy but objects to the policy on the basis that it is not compatible with the existing uses and permissions that are located within it. Point 7 states that the Master Plan will provide “a programme of renewal of the existing building stock at West Canvey and an overall increase in commercial floorspace of 10%” but fails to recognise that that a strategy which seeks only to renew existing provision will mean that existing businesses will need to be displaced while the construction works take place. This means that, despite having aims to “increase industrial floorspace by 10%”, this policy is likely to reduce industrial provision in the short term, especially as no additional employment land has been identified in the emerging plan to “decant” these business to while the old stock is renewed, and noting the critically low vacancy levels in Castle Point highlighted in our previous representations. 2.4 It is for these reasons that the policy should extend the “Broad Location” allocation to include the sites identified	2.5 Additionally, the policy text for Policy C4 makes no reference to the extant, permitted development at the Northwick Site (15/0293/RES), despite this land being included within the wider allocation. This omission creates ambiguity regarding the intended role of the Northwick Site within the allocation and risks implying that alternative uses identified in Policy C4 e.g. residential and community uses, are appropriate on this land, contrary to the established planning position. 2.8 The omission of the Northwick Site’s established role and permitted development within Policy C4 is therefore misleading and therefore “unjustified” in the tests for soundness. It inaccurately suggests that the residential and community uses proposed elsewhere within the allocation may also be achievable or supported on the Northwick Site, when in fact no such uses are deliverable or being promoted. 2.9 Policy C4 should be amended to explicitly support employment uses, consistent with the extant permission, at the Northwick Site. This would ensure the policy accurately reflects the site’s development context					Agrees with the broad intentions of policy C4 Objects that the proposal conflicts with existing uses Displacement while construction works are taking place Extend the broad location to include the 5 sites identified in option 2a of the SA provide additional floorspace Remove inclusion of alternative uses ie residential and community uses. Exclude development at the Northwick site (15/0293/RES) as the policy does not reflect the existing permission	Support noted. Conflicts with existing uses Policy C4 seeks a masterplan approach that will provide a land use strategy that identifies how a mix of uses comprising residential, community, commercial and industrial can be accommodated whilst ensuring residential amenity and avoiding harm to economic activity. Displacement during works This broad location is not likely to be developed all in one go, taking a strategic look at the whole area allows a comprehensive and hollistic approach to regeneration however the implementation is likely to be done in phases. The logistics of the construction	N

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											in Option 2a of the Sustainability Appraisal as being suitable for “limited release”. The 5 sites it identifies will provide additional land to meet a greater percentage of the borough’s unmet housing and employment need as well as providing well located, sustainable locations to which existing businesses at Charfleets Industrial Park can be “decanted” while the old stock is renewed. Without these proposed changes, Policy C4 will not be effective or positively prepared, and therefore the plan will not be sound.	and avoids creating false expectations or policy conflict.							work and the impact that this has on existing occupiers will be detailed in a construction environment management plan prepared and submitted to the council in accordance with policy SD6. Extend the Broad Location The sustainability appraisal details why these options have not been selected. It should also be noted that it is green belt land which has many constraints as detailed in the Housing Capacity Topic Paper Remove other uses The policy is intended to bring regeneration and renewal to the area which will optimise urban land use and improve the quality of the urban	

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																		environment and public realm. This includes ensuring that the area has public services and community uses as well as residential development. Exclude Northwick site from the broad location This site has been included within the broad location so that effective links can be created within the area.	
0643-0001	Organisation	Robert	Spin k	King John's Wood Land owners Consortium	Yes	SP3	No	The Draft LP does not comply with the LDS. It does not comply with the NPPF, particularly in identifying current GB land which is not meeting the GB functions and is previously developed. It does not provide the mandatory Standard number of dwellings. CPBC has not worked sufficiently collaboratively with neighbouring authorities.	No	Positively prepared, Effective, Justified, Consistent with national policy	It does not comply with the NPPF, particularly in identifying current GB land which is not meeting the GB functions and is previously developed and therefore could and should be released to provide much needed homes and to take a fairer share of the region's housing need. It does not provide the mandatory Standard number of dwellings. It fails to provide economic activity and the homes needed in the borough. It fails to set out the correct	The previous Lp which was found sound but not adopted by the council should be used as the basis for the new LP. This would assist in making the new LP sound.	Yes	Not Answered	Not Answered	A	Does not meet the standard method housing target Does not release any GreenBelt regardless of if it meets GreenBelt function tests or not Dwelling mix relies too heavily on flats	Standard Method Housing Target Taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. More	N

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											mix of dwellings, relying too much on flats.							information on this can be found in the Housing Topic Paper. Green Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence	

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																		of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those	

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																		reasons set out above. Dwelling Mix An update to the Local Housing Needs Assessment, Gypsy and Traveller Accommodation Assessment and a Specialist and Supporting Housing Assessment (prepared by Essex County Council) has informed policies within the Castle Point Plan to ensure a mix of housing types are delivered for our future residents. This includes ensuring the needs of our ageing population and those unable to afford to buy a home are met.	
0275-0001	Organisation	Joe	May	Leigh Town Council	Not Stated	SP3	Not Stated	The following comments regarding the Castle Point Plan have been agreed by Leigh-on-Sea Town Council's Planning, Licensing and Environment Committee on Tuesday 9th September 2025: We write further to our letter of 18	Not Stated				Not Stated		No	B - see 0275-0003	<u>Salvation Army land in Hadleigh</u> Leigh-on-Sea Town Council is concerned that the Salvation Army land in Hadleigh is vulnerable to being developed, whilst	Comments noted.	N

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								September 2024 and your subsequent response. Previously Leigh-on-Sea Town Council expressed strong objection to the Salvation Army land in Hadleigh being allocated for development. Whilst we acknowledge the fact that the latest iteration of the Local Plan does not allocate this land for development we remain concerned at its now evident vulnerability and there is no preclusion to the landowner/developer making a planning application in advance of the adoption of the Local Plan. Should they do so, given that non-inclusion will not have been endorsed by an Inspector and that Castle Point Borough Council has not met the targets for housing set by Government, the vulnerability is clear despite Green Belt policy. If such an application comes forward Leigh-on-Sea Town Council will seek to object in the strongest possible terms for all the previously rehearsed reasons and we would be grateful if, therefore, you would keep our correspondence on file to be laid before your members. Alternatively, given the Salvation Army's previous position we anticipate that they or a										acknowledging that it has not been allocated for development. Castle Point Borough Council has not met the targets for housing set by Government, the vulnerability is clear despite Green Belt policy. If such an application comes forward Leigh-on-Sea Town Council will seek to object in the strongest possible terms for all the previously rehearsed reasons and we would be grateful if, therefore, you would keep our correspondence on file to be laid before your members. <u>Bus Enhancements</u> The Town Council is pleased to see the enhancement of the bus services between Hadleigh and Leigh-on-Sea which we very much hope will lead to less congestion and traffic movements.		

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								developer will seek to promote the land through the Local Plan EIP process, possibly running alongside any planning application. Our objections would be equally relevant to such a scenario and we would ask again that you keep them on record for the Inspector to take them into account. We would be grateful if you would take these comments into account before deciding whether to confirm that allocation. The Town Council is pleased to see the enhancement of the bus services between Hadleigh and Leigh-on-Sea which we very much hope will lead to less congestion and traffic movements.											
0275-0002	Organisation	Joe	May	Leigh Town Council	Not Stated	Had 4	Not Stated	We have also considered the allocation HAD4 for 114 homes. Leigh-on-Sea Town Council consider that such a development could have a serious knock on effect to Leigh-on-Sea particularly the Highlands Boulevard area through the town to the Station where the temptation for commuters from the development to use Leigh station will create a detrimental effect on the road system and parking in the area which is already under stress.	Not Stated				Not Stated		No	B - see 0275 - 0003	<u>Policy HAD4</u> We have also considered the allocation HAD4 for 114 homes. Leigh-on-Sea Town Council consider that such a development could have a serious knock on effect to Leigh-on-Sea particularly the Highlands Boulevard area through the town to the Station where the temptation for commuters from the development to	Comments noted.	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	use Leigh station will create a detrimental effect on the road system and parking in the area which is already under stress.		
0275-0003	Organisation	Joe	May	Leigh Town Council	Not Stated	Whole Plan	Not Stated	The following comments regarding the Castle Point Plan have been agreed by Leigh-on-Sea Town Council's Planning, Licensing and Environment Committee on Tuesday 9th September 2025 and re-agreed on Tuesday 11th November 2025.									The following comments regarding the Castle Point Plan have been agreed by Leigh-on-Sea Town Council's Planning, Licensing and Environment Committee on Tuesday 9th September 2025 and re-agreed on Tuesday 11th November 2025.	Noted.	N
0270-0001	Organisation	Andy	Coombes	Manor Training Centre UK Ltd	Yes	B8	No	I am a local business on the Manor Trading Estate and have had a presence on the estate since 2006. 1st I record that I have had the opportunity to read and fully understand my neighbour "G&K Groundworks Ltd" Unsound submission. For clarity I attach a copy of G&Ks submission to this e-mail.	No	Not Stated	I record here that Manor Training Centre UK Ltd agree with G&K Groundworks Ltd.'s that the regulation 19 draft as presented is Unsound. For the record and as relayed in G&K Groundworks Ltd submission • CPBC have never engaged with me / my business about our future on this estate. • Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE	Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.	No		Yes, attached is G&K Groundworks Ltd's response to the consultation		The regulation 19 draft as presented is Unsound. CPBC have never engaged with the business community on this estate. Have never informed as is on the council's regeneration web page at priority No 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough	Policy B8 part 6 states 'A programme of renewal of the industrial and commercial building stock within the estate with the overall aim of an increase in floor space of at least 10%' Paragraph 9.28 states ' It is not the intention of the Master Plan to result in a loss of employment on this site.	N

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											North of the Borough • I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. I am certainly more confused now! Where am I going to be re-homed? This Regulation 19 along with the recent green belt review indicates that the area North where we are moving to has been identified as GB16 and has been discounted as it is not a viable! Option. I would like to record my total disbelief that CPBC along with our local councillors think it's OK to treat us the MTE business community with total disrespect. Suffice – I record again that this draft plan is unsound as it has not engaged with the business on the MTE at all. Albeit we are the drivers of the local economy.						I presume CPBC intends to compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. Some Background G&K are the title owners of HMLR EX498233 the footprint is 1.22 ha just over 3 acre's which is except for connect packaging the largest single commercial / industrial premises on the Manor Trading Estate. Benfleet Essex. (MTE) G&K houses 28 tenants, albeit CPBC are fully aware of those tenants & business as this draft document clearly states CPBC have engaged with them all. For the avoidance of doubt and I engage with all my tenants on a at least a weekly basis not one of them has had any engagement with CPBC officers, councillors nor	Overall, the Master Plan should seek a modest increase in the floor space available for industrial and commercial uses to support economic growth. This will be secured through the revised approach to design and parking.'	

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																	CPBC co-opted Deyton Bell. Fact this property has warehousing & storage buildings along with separate offices and external yards • 10 units have a warehouse footprint of 2400sq ft along with attached offices of 600 sq. ft and associated attached yards of 1200 sq. ft • 3 Units of 1200 sq. ft with 300 sq. ft office & 600 sq. ft of attached rear yard • It has 1 exceptionally large yard of over 20,000 sq. ft which is houses a significant 14 MW power station that feed the local grid. So, a significant contributor to the local economy. • It has 13 yards ranging from 1250 sq. ft to 5400 sq.ft. We are full to the brim. We continually must turn away enquiries for warehousing and offices. Aside from G&K Groundworks Ltd		

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																	and its 28 tenants it appears from conversation with other business on the MTE they have not been engaged with. Yet this draft document along with the many website uploads. All indicate that our opinions are reflected in this draft plan. That is not true! Questions over consistency with CPBC Regeneration policies		
0710-0001	Individual	Robert	Baillie	N/A	Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0750-0001	Individual	Sean Douglas Brian	Quartermaine	N/A	Yes	C4	No	S.4 of the Castle Point Statement of Community Involvement 2020 states that, subject to reasonable cost and time constraints, safe and effective engagement methods would be utilised. The overwhelming majority of people on Canvey did not know about the Issues & Options consultation or this Regulation 19 consultation. The former was advertised on social media (most residents wouldn't see it), within an advertising	No	Effective, Justified, Consistent with national policy	Effective - this plan is not deliverable due to its reliance upon C4 West Canvey Employment area. The suggestion to simultaneously increase the floorspace for commercial/industrial use as well as redesignate a large enough area to add thousands of dwellings is not clearly explained. More specifically, it is not explain what the new layout of this large area would be, who would pay for it, what happens to the existing businesses, and more. This is not a durable proposal.	Legal Compliance: 1) Immediately get information on the consultation posted to every residence in Castle Point. 2) Provide clear alternatives to the online form for residents to raise comments, suggestions, and objections. Sound: 3) Remove C4 West Canvey employment area from the draft plan. 4) Add North-West Thundersley to the draft plan, maximise residential allocations there, provide	No	Not Answered	Not Answered		Lack of publication of the consultation Concerned about the redevelopment of Charfleets Suggesting North West Thundersley as an alternative	Consultation advertisement Comments noted. The council has prioritised inclusivity for the consultations and has advertised the consultations through numerous mediums and platforms. Further details of this is included in the reg 18 consultation	N

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								booklet (even if received, most people never read these), and some people on Canvey received a bespoke booklet just focusing on the plan (brilliant method, should have been used for Reg. 19 too!) but it was not clear on the front of this booklet that this related to mass development so most people would not know the value of engagement as demonstrated by the extremely low response rate. Also, there was a severely disproportionately low number of engagement sessions booked for Canvey Island relative to its population. The latter seems only to have been advertised on social media, and with less than 3 weeks to go before the consultation closes it seems clear this is deliberate so that Canvey residents are not aware of the new addition after the last consultation to add thousands of extra flats to the plan just for Canvey. It is not reasonable or appropriate to expect residents to do the council's job for it to raise awareness of the consultation. Also, the consultation form is difficult for less			Consistent with national policy - C4 West Canvey Employment area is not a sustainable development for economic reasons. It severely limits the available area for expansion of commercial/industrial areas whilst simultaneously the plan is reducing such areas (e.g. Canvey Supply) elsewhere in the plan. The last local plan (1998-2003) designed the land for employment some of which was only developed much later on. This change of designation relies upon the unrealistic hope that the layout of the commercial/industrial units might change and that they might not actually use the current surplus land in the future. It also Creates a long-term inefficiency in planning on Canvey Island and would force encroachment on the green belt for the next local plan. Justified - North-West Thundersley (Blinking Owl) is a far more reasonable and appropriate location. It can facilitate large-scale residential development which alone could exceed the borough's objectively assessed needs whilst minimising the severe infrastructure problems which overdeveloping	the obvious infrastructure connections on the A127, A1245, and A130 (I would suggest another roundabout near the Rayleigh Spur where the current slip road is, or underpasses/flyovers) as well as other reasonable connections.						statement and reg 22 consultation statement. Charfleets Charfleets Industrial Estate is included within Policy E1 which includes the statement 'the Council will seek to provide and retain Class E(g), B2 and B8 use classes or other 'sui generis' uses of a similar employment nature unless it can be demonstrated that there is no reasonable prospect for the site to be used for these purposes'. This policy will apply until such time as a master plan for West Canvey has been developed. Policy E1 may subsequently change in terms of its approach to Charfleets when the Castle Point Plan is reviewed in 5	

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								technically-able people to use, and due to the lack of proper information being sent to residents it is not clear what alternative methods there are to provide a consultation response. This failure to use effective methods of consultation mean the council has failed the to carry out the drafting of the plan in compliance in line with its Statement of Community Involvement.			Canvey would cause, especially to the road network and inevitable pressures on Canvey's sole exit bottle-neck for private and public vehicles to use at Waterside Farm roundabout. The council instead should have maximised the development potential for North-West Thundersley which would allow a longer-term Local Plan to be enacted and more certainty given to property developers for what can be built in Castle Point.							years' time, to enable the delivery of the West Canvey regeneration. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0355-0001	Duplicate representation received.																		

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	See representation 0768-0001.																		
0356-0001	Duplicate representation received. See 0051-0001.								No										
0357-0001	individual	E L	King			Whole Plan	Yes		Yes							A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0358-0001	individual	T	Hertage			Whole Plan	Yes		Yes							A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0359-0001	individual	J	Baylis			Whole Plan	Yes		Yes							A	Castle Point Plan is sound and legally compliant.	Support noted.	N

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0793-0001	Individual	Maria	Cooper	N/A	Yes	SP3	No	Re: Castle Point Plan – Regulation 19 Draft (July 2025) – Objection I write as a resident of Canvey Island to make representations in objection to aspects of the Castle Point Plan (Regulation 19 draft, July 2025). While I appreciate the effort that has gone into preparing this Plan, I believe that certain proposals (especially those affecting Canvey Island) are unsound, insufficiently justified and pose serious risks to local communities, infrastructure, environment and quality of life. I urge that these matters be revisited and amended before the Plan is submitted for examination. Below are my specific objections and requests.  1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability The Plan proposes to allocate over 3,300 homes on Canvey Island. Such scale of development risks placing unsustainable pressure on already stretched infrastructure	No	Consistent with national policy	Re: Castle Point Plan – Regulation 19 Draft (July 2025) – Objection I write as a resident of Canvey Island to make representations in objection to aspects of the Castle Point Plan (Regulation 19 draft, July 2025). While I appreciate the effort that has gone into preparing this Plan, I believe that certain proposals (especially those affecting Canvey Island) are unsound, insufficiently justified and pose serious risks to local communities, infrastructure, environment and quality of life. I urge that these matters be revisited and amended before the Plan is submitted for examination. Below are my specific objections and requests.  1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability The Plan proposes to allocate over 3,300 homes on Canvey Island. Such scale of development risks placing unsustainable pressure on already stretched infrastructure (roads, sewage, flood protection, health, schools,	Re: Castle Point Plan – Regulation 19 Draft (July 2025) – Objection I write as a resident of Canvey Island to make representations in objection to aspects of the Castle Point Plan (Regulation 19 draft, July 2025). While I appreciate the effort that has gone into preparing this Plan, I believe that certain proposals (especially those affecting Canvey Island) are unsound, insufficiently justified and pose serious risks to local communities, infrastructure, environment and quality of life. I urge that these matters be revisited and amended before the Plan is submitted for examination. Below are my specific objections and requests.  1. Over-allocation of homes in Canvey Island, given infrastructure vulnerability The Plan proposes to allocate over 3,300 homes on Canvey Island. Such scale of development risks placing unsustainable pressure on already stretched infrastructure (roads, sewage, flood protection, health, schools, etc.).	No	Not Answered	Not Answered	A	Infrastructure Transport Third Road onto Canvey Flood Risk on Canvey Green/Grey belt Alternative sites	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure Delivery Plan. Alongside this, the Local Transport Authority, Essex County Council, have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport	N

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								(roads, sewage, flood protection, health, schools, etc.). - In particular, I note that Canvey Island has significant infrastructure vulnerabilities. The Plan's evidence base does not convincingly show how the cumulative impacts of this level of housing will be mitigated to avoid severe harm. - Without firm and funded commitments to improving key infrastructure (transport links, drainage/flood defences, capacity of utilities and services), such housing allocation could lead to deterioration of living conditions for existing and new residents. 2. Transport, highways and accessibility concerns - Access from Canvey Island / developments may further exacerbate congestion, especially at major junctions, and the Plan lacks clarity or certainty on how road and traffic impacts will be managed. - Evidence supplied so far appears weak in demonstrating how additional vehicle movements will be accommodated without severe negative effects. - Particularly, any reliance			etc.). - In particular, I note that Canvey Island has significant infrastructure vulnerabilities. The Plan's evidence base does not convincingly show how the cumulative impacts of this level of housing will be mitigated to avoid severe harm. - Without firm and funded commitments to improving key infrastructure (transport links, drainage/flood defences, capacity of utilities and services), such housing allocation could lead to deterioration of living conditions for existing and new residents. 2. Transport, highways and accessibility concerns - Access from Canvey Island / developments may further exacerbate congestion, especially at major junctions, and the Plan lacks clarity or certainty on how road and traffic impacts will be managed. - Evidence supplied so far appears weak in demonstrating how additional vehicle movements will be accommodated without severe negative effects. - Particularly, any reliance on accessing the A127 / A130 (or use of congested	- In particular, I note that Canvey Island has significant infrastructure vulnerabilities. The Plan's evidence base does not convincingly show how the cumulative impacts of this level of housing will be mitigated to avoid severe harm. - Without firm and funded commitments to improving key infrastructure (transport links, drainage/flood defences, capacity of utilities and services), such housing allocation could lead to deterioration of living conditions for existing and new residents. 2. Transport, highways and accessibility concerns - Access from Canvey Island / developments may further exacerbate congestion, especially at major junctions, and the Plan lacks clarity or certainty on how road and traffic impacts will be managed. - Evidence supplied so far appears weak in demonstrating how additional vehicle movements will be accommodated without severe negative effects. - Particularly, any reliance on accessing the A127 / A130 (or use of congested local roads) must be justified, with robust modelling and mitigation.						networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Third Road onto Canvey The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000	

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								on accessing the A127 / A130 (or use of congested local roads) must be justified, with robust modelling and mitigation. 3. Flood risk and environmental constraints - Canvey Island, being low-lying and with existing flood risk, may not be a suitable location for large scale development unless flood risk is fully addressed. The Plan’s flood risk assessments should be very carefully scrutinised, and appropriate mitigation required (including sustainable drainage, green infrastructure, etc.). - Also, environmental assets, green/open spaces, biodiversity, and Green Belt/grey belt protections must be respected. Any encroachment on such areas should only occur after full assessment and only if no reasonable alternative exists. 4. Green Belt / Grey Belt / Urban Capacity - The Plan claims to avoid Green Belt development and to focus on urban capacity. - However, given the number of houses proposed in Canvey, there is concern whether urban capacity alone is sufficient,			local roads) must be justified, with robust modelling and mitigation. 3. Flood risk and environmental constraints - Canvey Island, being low-lying and with existing flood risk, may not be a suitable location for large scale development unless flood risk is fully addressed. The Plan’s flood risk assessments should be very carefully scrutinised, and appropriate mitigation required (including sustainable drainage, green infrastructure, etc.). - Also, environmental assets, green/open spaces, biodiversity, and Green Belt/grey belt protections must be respected. Any encroachment on such areas should only occur after full assessment and only if no reasonable alternative exists. 4. Green Belt / Grey Belt / Urban Capacity - The Plan claims to avoid Green Belt development and to focus on urban capacity. ☐ - However, given the number of houses proposed in Canvey, there is concern whether urban capacity alone is sufficient, and whether some sites already considered might have unacceptable	3. Flood risk and environmental constraints - Canvey Island, being low-lying and with existing flood risk, may not be a suitable location for large scale development unless flood risk is fully addressed. The Plan’s flood risk assessments should be very carefully scrutinised, and appropriate mitigation required (including sustainable drainage, green infrastructure, etc.). - Also, environmental assets, green/open spaces, biodiversity, and Green Belt/grey belt protections must be respected. Any encroachment on such areas should only occur after full assessment and only if no reasonable alternative exists. 4. Green Belt / Grey Belt / Urban Capacity - The Plan claims to avoid Green Belt development and to focus on urban capacity. ☐ - However, given the number of houses proposed in Canvey, there is concern whether urban capacity alone is sufficient, and whether some sites already considered might have unacceptable impacts. - If the Council is to rely on urban sites, these must be deliverable, accessible,						households on Canvey. However, the strategic need for access improvements to Canvey Island have been identified through the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex specifically identifies three projects which will improve accessibility to and from the Island. The Local Transport Plan sits alongside the Castle Point Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not	

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								and whether some sites already considered might have unacceptable impacts. • If the Council is to rely on urban sites, these must be deliverable, accessible, sustainable, and not cause unacceptable adverse effects (traffic, services, amenities, character etc.). 5. Lack of clarity on delivery, timing and funding of mitigation • The Plan identifies infrastructure costs of tens of millions. For example, the Infrastructure Delivery Plan estimates ~£63m excluding transport in some instances. • But the Plan does not clearly set out how or when these mitigations will be funded, delivered, monitored. Without such certainty, there is risk that development proceeds ahead of needed infrastructure improvements. • Also, there is risk that the viability of housing delivery, especially mixed use/town centre regeneration, may be compromised without financial support/regeneration funding. 6. Soundness and compliance with national			impacts. • If the Council is to rely on urban sites, these must be deliverable, accessible, sustainable, and not cause unacceptable adverse effects (traffic, services, amenities, character etc.). 5. Lack of clarity on delivery, timing and funding of mitigation • The Plan identifies infrastructure costs of tens of millions. For example, the Infrastructure Delivery Plan estimates ~£63m excluding transport in some instances. • But the Plan does not clearly set out how or when these mitigations will be funded, delivered, monitored. Without such certainty, there is risk that development proceeds ahead of needed infrastructure improvements. • Also, there is risk that the viability of housing delivery, especially mixed use/town centre regeneration, may be compromised without financial support/regeneration funding. 6. Soundness and compliance with national policy • The Plan must satisfy the tests of soundness under the National Planning Policy	sustainable, and not cause unacceptable adverse effects (traffic, services, amenities, character etc.). 5. Lack of clarity on delivery, timing and funding of mitigation • The Plan identifies infrastructure costs of tens of millions. For example, the Infrastructure Delivery Plan estimates ~£63m excluding transport in some instances. • But the Plan does not clearly set out how or when these mitigations will be funded, delivered, monitored. Without such certainty, there is risk that development proceeds ahead of needed infrastructure improvements. • Also, there is risk that the viability of housing delivery, especially mixed use/town centre regeneration, may be compromised without financial support/regeneration funding. 6. Soundness and compliance with national policy • The Plan must satisfy the tests of soundness under the National Planning Policy Framework (NPPF 2024), especially: a) Positively prepared — meeting objectively						functional flood plain as it is substantially defended from flooding. The recommendations of the Strategic Flood Risk Assessment do not seek to restrict the overall level of development in the borough, including on Canvey, but aim to direct the location of development and/or the design of development to minimise exposure to flood risk. Furthermore, flooding and the need for flood management infrastructure is covered by policies SP4, SD1, SD2 and SD3 of the plan, and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. Green/Grey Belt The Council has	

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								policy - The Plan must satisfy the tests of soundness under the National Planning Policy Framework (NPPF 2024), especially: a) Positively prepared — meeting objectively assessed need where possible; b) Justified — having considered reasonable alternatives and based on proportionate evidence; c) Effective — being deliverable in the Plan period; d) Consistent with national policy — especially in relation to flood risk, Green Belt protection, infrastructure and habitat protection. - I submit that the proposals for Canvey fail on several of these: the evidence for infrastructure mitigation is not sufficiently detailed; reasonable alternatives (lower housing densities, redirecting growth to less vulnerable areas) have not been fully explored; and risks (flood, congestion) may make parts of the strategy ineffective or harmful. 7. Equality / Health / Community Impacts - The Equality Impact Assessment (EQIA) accompanying the Plan is			Framework (NPPF 2024), especially: a) Positively prepared — meeting objectively assessed need where possible; b) Justified — having considered reasonable alternatives and based on proportionate evidence; c) Effective — being deliverable in the Plan period; d) Consistent with national policy — especially in relation to flood risk, Green Belt protection, infrastructure and habitat protection. - I submit that the proposals for Canvey fail on several of these: the evidence for infrastructure mitigation is not sufficiently detailed; reasonable alternatives (lower housing densities, redirecting growth to less vulnerable areas) have not been fully explored; and risks (flood, congestion) may make parts of the strategy ineffective or harmful. 7. Equality / Health / Community Impacts - The Equality Impact Assessment (EQIA) accompanying the Plan is	assessed need where possible; b) Justified — having considered reasonable alternatives and based on proportionate evidence; c) Effective — being deliverable in the Plan period; d) Consistent with national policy — especially in relation to flood risk, Green Belt protection, infrastructure and habitat protection. - I submit that the proposals for Canvey fail on several of these: the evidence for infrastructure mitigation is not sufficiently detailed; reasonable alternatives (lower housing densities, redirecting growth to less vulnerable areas) have not been fully explored; and risks (flood, congestion) may make parts of the strategy ineffective or harmful. 7. Equality / Health / Community Impacts - The Equality Impact Assessment (EQIA) accompanying the Plan is welcome in intention. But for Canvey, many of the negative impacts fall disproportionately on vulnerable groups (older people, low income households, people with health vulnerabilities) due to existing deficits in access to healthcare, etc.						undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around	

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								welcome in intention. But for Canvey, many of the negative impacts fall disproportionately on vulnerable groups (older people, low income households, people with health vulnerabilities) due to existing deficits in access to healthcare, etc. - Also, increased demand on public services (e.g. schools, health, social care) without matching improvements may reduce quality or availability.  Conclusion and Requests Given these objections, I request that the Council: - Reconsider the scale of housing proposed for Canvey Island, reducing to a level that infrastructure can support without risk of severe harm. - Provide clearer, costed, and time-bound commitments for critical infrastructure mitigation (transport, flood protection, drainage, wastewater, health, etc.) before allocating further development. - Undertake further assessment of alternative sites or lower density options, particularly avoiding high risk / high cost sites (flood-prone, difficult access).			people, low income households, people with health vulnerabilities) due to existing deficits in access to healthcare, etc. - Also, increased demand on public services (e.g. schools, health, social care) without matching improvements may reduce quality or availability.  Conclusion and Requests Given these objections, I request that the Council: - Reconsider the scale of housing proposed for Canvey Island, reducing to a level that infrastructure can support without risk of severe harm. - Provide clearer, costed, and time-bound commitments for critical infrastructure mitigation (transport, flood protection, drainage, wastewater, health, etc.) before allocating further development. - Undertake further assessment of alternative sites or lower density options, particularly avoiding high risk / high cost sites (flood-prone, difficult access). - Ensure that delivery plans (funding, phasing) are explicit, transparent and enforceable, so that	- Also, increased demand on public services (e.g. schools, health, social care) without matching improvements may reduce quality or availability.  Conclusion and Requests Given these objections, I request that the Council: - Reconsider the scale of housing proposed for Canvey Island, reducing to a level that infrastructure can support without risk of severe harm. - Provide clearer, costed, and time-bound commitments for critical infrastructure mitigation (transport, flood protection, drainage, wastewater, health, etc.) before allocating further development. - Undertake further assessment of alternative sites or lower density options, particularly avoiding high risk / high cost sites (flood-prone, difficult access). - Ensure that delivery plans (funding, phasing) are explicit, transparent and enforceable, so that development does not outpace essential services. - Strengthen monitoring and accountability mechanisms, so that						Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Alternative Sites All reasonable option sites were considered in the Strategic	

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								difficult access). 4. Ensure that delivery plans (funding, phasing) are explicit, transparent and enforceable, so that development does not outpace essential services. 5. Strengthen monitoring and accountability mechanisms, so that residents can see whether mitigation promises are being met. 6. Ensure that any development respects the environmental constraints of Canvey Island, preserves green/open spaces, protects biodiversity, and manages flood risk in line with best practice and national policy.  I trust the Council will take these concerns seriously in finalising the Plan. I am willing to meet or provide further evidence in support of these objections. Please confirm that this representation will be officially considered at examination. 			development does not outpace essential services. 5. Strengthen monitoring and accountability mechanisms, so that residents can see whether mitigation promises are being met. 6. Ensure that any development respects the environmental constraints of Canvey Island, preserves green/open spaces, protects biodiversity, and manages flood risk in line with best practice and national policy.  I trust the Council will take these concerns seriously in finalising the Plan. I am willing to meet or provide further evidence in support of these objections. Please confirm that this representation will be officially considered at examination. 	residents can see whether mitigation promises are being met. 6. Ensure that any development respects the environmental constraints of Canvey Island, preserves green/open spaces, protects biodiversity, and manages flood risk in line with best practice and national policy.  I trust the Council will take these concerns seriously in finalising the Plan. I am willing to meet or provide further evidence in support of these objections. Please confirm that this representation will be officially considered at examination. 						Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).	
1106-0001	Organisation	Diana	Nagobi	National Highways		Whole Plan	Not Stated		Not Stated	Not Stated	National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority,					B - see 1106-003 and 110	National Highways network does not extend to the Castle Point Plan area. The nearest access points to the SRN (M25	Noted	N

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											traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. This plan focuses on the site allocations and key policies for the Castle Point Plan area over the period of 2026 to 2043. Our network does not extend to the Castle Point Plan area. The nearest access points to the SRN (M25 Junction 29 and Junction 30 and the A13/A1089 junction) are approximately 12 miles from the Castle Point boundary, via the A127 and A13 respectively. Given the locations of the development, we anticipate that much of the traffic generated would be contained within the Castle Point boundary and the surrounding area.					6-004	Junction 29 and Junction 30 and the A13/A1089 junction) are approximately 12 miles from the Castle Point boundary, via the A127 and A13 respectively. Given the locations of the development, NH anticipate that much of the traffic generated would be contained within the Castle Point boundary and the surrounding area.		
1106-0002	Organisation	Diana	Nagobi	National Highways		C5	Not Stated		Not Stated	Not Stated	Whilst it is unlikely that the development would generate significant new trips on the A13 and M25, we note that Policy C5 is focused on improving access to and around Canvey Island. It is acknowledged that the A13 and A130 are key access points into Canvey Island and that the junctions and a feasibility study will be					B - see 1106-003 and 1106-004	We note that Policy C5 is focused on improving access to and around Canvey Island. It is acknowledged that the A13 and A130 are key access points into Canvey Island and that the junctions and a feasibility study will be carried out to	Noted. Although Government Departments are mentioned in C5(2) it is agreed that National Highways warrants specific mention. Clarifying mod proposed to	Y

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											carried out to identify their options for improving access to, from and within Canvey Island, including its wider strategic implications. Some key collaboration partners are identified although National Highways is not mentioned specifically. Within paragraph 2.1 our Memorandum of Understanding, Castle Point state their intention to engage with us in the study, to include the preparation of the brief with the aim of ensuring that any areas of concerns raised by National Highways are explored within the study. We agreed that that the exception to a requirement for a Strategic Transport Assessment (STA) will be when a new access road to Canvey Island comes forward and an STA will be required at that stage to assess the impacts that a new access to Canvey Island would have on the SRN. We ask that National Highways are engaged and included in any future consideration of a new access to Canvey Island. We look forward to continued engagement with Castle Point Borough Council as the transport evidence base for the Local Plan is developed and would expect the transport assessment for the Local						identify their options for improving access to, from and within Canvey Island, including its wider strategic implications. Some key collaboration partners are identified although National Highways is not mentioned specifically. Within paragraph 2.1 our Memorandum of Understanding, Castle Point state their intention to engage with us in the study, to include the preparation of the brief with the aim of ensuring that any areas of concerns raised by National Highways are explored within the study. We agreed that that the exception to a requirement for a Strategic Transport Assessment (STA) will be when a new access road to Canvey Island comes forward and an STA will be required at that stage to assess the impacts that a new access to Canvey	Policy C5 '2. This will be prepared in collaboration with key partners including ECC, adjoining district and unitary councils, Transport East, National Highways , Government departments such as the DfT, BEIS and MHCLG and relevant agencies as well as engagement with the local community.	

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											Plan to identify if there is any potential for impact on the SRN and associated need for mitigation measures. We also look forward to being consulted on any planning applications that have the potential to impact the SRN in the future.						Island would have on the SRN. We ask that National Highways are engaged and included in any future consideration of a new access to Canvey Island. We look forward to continued engagement with Castle Point Borough Council as the transport evidence base for the Local Plan is developed and would expect the transport assessment for the Local Plan to identify if there is any potential for impact on the SRN and associated need for mitigation measures. We also look forward to being consulted on any planning applications that have the potential to impact the SRN in the future.		
1106-0003	Organisation	Diana	Nagobi	National Highways		Whole Plan	Not Stated		Not Stated	Not Stated	National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street					None	Following a review of the CPP Regulation 19 Consultation document (July 2025), we are satisfied that this consultation does	Noted	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN does not extend to the CPP area. We note that the nearest SRN junction is the A13/A1089 in Grays to the southwest of the consultation plan area. Junctions 29 and 30 of the M25 are located further to the west. Following a review of the CPP Regulation 19 Consultation document (July 2025), we are satisfied that this consultation does not directly impact National Highways or our network. However, we look forward to being consulted on any planning applications that have the potential to impact the SRN in the future. Thank you for consulting National Highways. We look forward to continuing to participate in future consultations and discussions.						not directly impact National Highways or our network. However, we look forward to being consulted on any planning applications that have the potential to impact the SRN in the future. We look forward to continuing to participate in future consultations and discussions.		
1106-0004	Organisation	Diana	Nagobi	National Highways		C5	Not Stated		Not Stated	Not Stated	We have reviewed the CPP 2026-2043 Regulation 19 Draft, dated July 2025, which focuses on the site allocations and key policies for the CPP area over the period of 2026 to 2043. We note that Policy C5 is focused on improving access to and around Canvey Island. The policy states that a feasibility					No	We have reviewed the CPP 2026-2043 Regulation 19 Draft, dated July 2025, which focuses on the site allocations and key policies for the CPP area over the period of 2026 to 2043. We note that Policy C5 is	Noted	N

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											study will be carried out to identify options for improving access to, from and within Canvey Island, including its wider strategic implications. In the future, should a proposal come forward to provide improved transport links from Canvey Island to the A130 / A13, we ask that National Highways are included in those discussions and consulted throughout the process.						focused on improving access to and around Canvey Island. The policy states that a feasibility study will be carried out to identify options for improving access to, from and within Canvey Island, including its wider strategic implications. In the future, should a proposal come forward to provide improved transport links from Canvey Island to the A130 / A13, we ask that National Highways are included in those discussions and consulted throughout the process.		
0341-0001	Organisation	Janet	Nuttall	Natural England		Vision	Yes	Thank you for your consultation on the above dated 01 August 2025. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. The Castle Point Plan 2026-2043 Regulation 19 Draft July 2025 We consider the Plan to be	Yes							A	Natural England welcome 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.	Addition to Vision point 3 as follows: Natural assets are protected and nature recovery is prioritised. Green spaces in local areas will be pleasant places to rest and play and will be connected into the wider network of multi-	Y - Addition to Vision point 3 as follows: Natural assets are protected and nature recovery is prioritised.

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								generally 'sound' on matters within Natural England's statutory remit for the natural environment. However, our comments below include advice around amendments to policy wording, for clarity around Habitats Regulations matters and/or to strengthen consistency with national planning policy, as set out in the National Planning Policy Framework (NPPF). Vision & Objectives We welcome 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. We support 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.									Natural England support 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.	functional green infrastructure, providing opportunities to connect with nature.	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.

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0341-0002	Organisation	Janet	Nuttall	Natural England		SP1	Yes	We welcome 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 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).	Yes		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 should be managed, maintained and monitored for a minimum of 30 years					A	Natural England welcome 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 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). The management of any new and	Modification to Policy SP1 agreed 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, subject to sensitive consideration of environmental assets including internationally important coastal sites and ensuring they are not adversely impacted by recreational pressure. 5. The management of any new and enhanced green infrastructure must be considered as part of the planning process,	Y - Modification to Policy SP1 agreed 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, subject to sensitive consideration of

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	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. should be managed, maintained and monitored for a minimum of 30 years[1]	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.	environmental assets including internationally important coastal sites and ensuring they are not adversely impacted by recreational pressure. 5. The management of any new and enhanced green infrastructure must be considered as part of the planning process, ensuring

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																			g it provide s 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.

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So un d?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
034 1-000 3	Organisat ion	Jan et	Nutt al	Natu ral Enga lnd		SP2	Yes	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	Ye s							A	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	Modifications agreed <u>Modification to Policy SP2</u> 3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network and biodiversity to offer a range of health, and environmental benefits; <u>Modification to Reasoned Justification</u> 6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity becomes more acute. By	Y - <u>Modifica tion to Policy SP2</u> 3d. Support integrat ed access to public open space, and the enhance ment of the multi-function al green infrastru cture network and biodiver sity to offer a range of health, and environ mental benefits; <u>Modifica tion to Reasone d Justifica tion</u> 6.30 As the

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																		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.	density of the urban areas increases within the Borough, the need to protect and enhance access and existing environmental assets to make the best use of local open spaces and protect urban biodiversity becomes more acute. By opening up access to a wide range of facilities, residents and

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																			visitors will have an increased choice about when and how often they use local green assets.
0341-0004	Organisation	Janet	Nuttall	Natural England		SP3	Yes	6.47 A Habitats Regulations Assessment will be required for 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 and will need to in order to demonstrate no adverse effects on site integrity before development can be granted permission’. We advise replacing the former sentence with this wording wherever it occurs throughout the document under different locations.	Yes							A	6.47 A Habitats Regulations Assessment will be required for 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 and will need to in order to demonstrate no adverse effects on site	<u>Modification to supporting paragraph</u> 6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage ~~in order to~~ and will need to demonstrate no adverse effects on site integrity before development can be granted permission. Same modifications to the	<u>Modification to supporting paragraph</u> 6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage ~~in order to~~ and will need to demonstrate no adverse effects on site integrity before development can be granted permission. Same modifications to the

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																	integrity before development can be granted permission '. We advise replacing the former sentence with this wording wherever it occurs throughout the document under different locations.	following paragraphs: 8.16, 8.26, 8.40, 8.72, 8.78, 9.23, 11.17, 13.46,14.28, 14.49, 17.8, 17.26, 18.16, 19.56, 20.30, 20.40 and 21.32 as set out in the Schedule of Modifications and the Natural England 'Statement of Common Ground'.	~~to~~ and will need to demonstrate no adverse effects on site integrity before development can be granted permission. Same modifications to the following paragraphs: 8.16, 8.26, 8.40, 8.72, 8.78, 9.23, 11.17, 13.46, 14.28, 14.49, 17.8, 17.26,

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																			18.16, 19.56, 20.30, 20.40 and 21.32
0341-0005	Organisation	Janet	Nuttall	Natural England		SP4	Yes	We welcome the inclusion of green and blue infrastructure (GI) in this policy.	Yes							A	We welcome the inclusion of green and blue infrastructure (GI) in this policy.	Support noted	N
0341-0006	Organisation	Janet	Nuttall	Natural England		C1	Yes	We are pleased to see reference to Essex Local Nature Recovery Strategy (LNRS) in this and other place-based policies.	Yes							A	We are pleased to see reference to Essex Local Nature Recovery Strategy (LNRS) in this and other place-based policies.	Modification to Policy C1(14) Policy C1(14). Development proposals must satisfy the requirements of the habitats regulations and 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).	Yes. Modification to Policy C1(14) Policy C1(14). Development proposals must satisfy the requirements of the habitats regulations and must be designed to enable and support the habitat priority measures identified within

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																			the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
0341-0007	Organisation	Janet	Nuttall	Natural England		C3	Yes	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.	Yes							A	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.	Support noted	N
0361-0001	Individual	Annette	Rousou		Yes	HAD3	No	I saw no consultation on the closing of the clinic. I know its popular for blood testing and being a local place, if one is ill, it is easier to go to rather than have to go to Southend Victoria.	Yes			Clinics should be made more use of for medical services: blood testing, hearing tests, urine testing collection etc				A	Objecting to HAD3 due to loss of NHS building	Policy HAD3 and Infra1 both safeguard the replacement of community facilities by ensuring that an alternative is provided and that the NHS building is	N

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																		surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	
0361-0002	Individual	Annette	Rouso		Yes	Thun3	No	I saw no consultation on the closure of this clinic, a local place for blood testing and essential for less mobile and non drivers,	Yes			Keep local clinics open and operating better and for more services to be facilitated there. Otherwise, I find the plan saves the greenbelt, which was the policy P.I.P were elected for. I understand the concerns of the people on Canvey regarding needing a third roading and building there will exasabate this need. However, London Rd, Kiln Rd, Rayleigh Rd, are often at a standstill in rush hour and any time during the weekends, so we don't need more cars living in borough.				A	Objecting to THUN3 because: Clinic should not be removed	Policy THUN3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	N
0361-0003	Individual	Annette	Rouso		Yes	HO U2	Yes	However, affordable housing is used to make people feel better about allowing development, the first buyer will never be able to own it; the second buyer will have no restriction on what they can sell it for, therefore it does not remian affordable, unless you are moving from London where homes sell at a premium. Locals will be priced out of their own area and Castle Point will end up being a mini London	Yes			See comment on where the blood testing facilities will be in Hadleigh and Benfleet.				A	Concern regarding affordability of affordable housing	The definition of affordable housing and what can be included as affordable housing provision is set by the government through the NPPF.	N

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0362-0001	Individual	John	Nicholls		Yes	SP3	No	There is no infrastructure to be in place to build 3,100 homes on Canvey Island. No 3RD road on and off the island	No	Positively Prepared							There is no infrastructure to be in place to build 3,100 homes on Canvey Island. No 3RD road on and off the island	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
0363-0001	Individual	Jill	Shaw		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate,	N

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											future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.								sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently,	

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																		the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the	

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																		housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic	

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																		Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the	

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																		Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our	

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																		Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0364-0001	Individual	Gilbert	Hurree		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0365-0001	Individual	Robert	Pigney		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N

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0366-0001	Individual	Debbie	Pigney		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0367-0001	Individual	Kathleen	Hurree		Yes	Whole Plan	Yes		Yes								Castle Point Plan is sound and legally compliant,	Support noted.	N
0368-0001	Individual	Clifford	Bishop		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in	N

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											significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.								keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year	

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																		housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market	

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																		to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not	

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																		included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has	

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																		found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil	

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																		a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0369-0001	Individual	Susanne	Binskin		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0370-0001	Individual	Nicholas	Williams		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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0371-0001	Individual	Roy	Soilleux		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0372-0001	Individual	William	Persy		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.					Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0373 - 0001	Individual	Richard	Ambrose		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0374-0001	Individual	Caroline	Ambrose		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0375-0001	Individual	Linda	White		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0376-0001	Individual	Brett	Holte		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0377-0001	Individual	Gabrielle	Peters		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0378 - 0001	Individual	Geoffrey	Stow		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0379-0001	Individual	Pauline	Stow		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0380-0001	Individual	John	Minkey		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0381-0001	Individual	Stephen	Chappell		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.					Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0382-0001	Individual	Chris	Prentice		Yes	SP3	Yes	I fully support consultation with local residents and think council should be commended for creating a proposal that aims to satisfy the desires of existing residents. I fully support the urban first approach and except existing "Brown Field" sites to be redeveloped and that green field (or grey field) sites should be left as they are. I	Yes							A	I fully support consultation with local residents and think council should be commended for creating a proposal that aims to satisfy the desires of existing residents. I fully support the urban first approach and	Support noted	N

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								think there is a need to create nice affordable properties, and more social housing and agree with a housing mix that favours smaller properties and denser developments. I agree with Local Housing Needs Assessment versus standard methodology. Building 255+ homes a year is significantly greater than 99 homes built during each of the last 10 years.									except existing "Brown Field" sites to be redeveloped and that green field (or grey field) sites should be left as they are. I think there is a need to create nice affordable properties, and more social housing and agree with a housing mix that favours smaller properties and denser developments. I agree with Local Housing Needs Assessment versus standard methodology. Building 255+ homes a year is significantly greater than 99 homes built during each of the last 10 years.		
0382-0002	Individual	Chris	Prentice		Yes	Had 1	Yes	I am surprised and disappointed that this site, which I agree is totally suitable for redevelopment, can only accommodate 388 new homes. The site is well served by public transport and has car parking nearby so I do not see why more homes could not be built? I am told that there is reluctance or resilience from Essex County Council to engage with Castle Point with particular regard to	Yes							A	Would like more homes to be provided on this site. there is reluctance or resilience from Essex County Council to engage with Castle Point with particular regard to including the library and old fire station within the redevelopment. How can our local	The density of the site has been informed by the Density and Capacity study, please see this for further information. The Hadleigh Island site which includes the library and the old fire station is included within HAD1 and the is	N

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								including the library and old fire station within the redevelopment. How can our local council be criticised for not creating sufficient new homes when third parties do not support making better use of existing underutilised Brown Field Sites?									council be criticised for not creating sufficient new homes when third parties do not support making better use of existing underutilised Brown Field Sites?	anticipated to provide 74 homes and 908m2 of non residential floor space.	
0382-0003	Individual	Chris	Prentice		Yes	Thun2	Yes	I fully support making better use of existing developed sites, and haven't seen a specific proposal for this site but wouldn't want new homes to be at the expense of provision of further education for young people. We need to ensure young people have the skills necessary to be usefully employed, and to earn a salary that will ultimately offer a comfortable standard of living.	Yes							A	Concern regarding the loss of education provision for young people	Policy THUN2 requires a master plan to be produced with a phasing plan to ensure that the education provision on or off site has a timely delivery.	N
0382-0004	Individual	Chris	Prentice		Yes	T2	Yes	It is important to create employment for local residents, but would like to see better infrastructure, in particular roads that allow for movement of freight with disrupting other motorists, cyclists and pedestrians. The A127 between Rayleigh Weir and Fairglen interchange is totally inappropriate for the volume of traffic, but I am told this is the responsibility of Essex County Council. How can we have a local plan that doesn't provide infrastructure?	Yes							A	better infrastructure, in particular roads that allow for movement of freight with disrupting other motorists, cyclists and pedestrians, How can we have a local plan that does not provide infrastructure?	Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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0383 - 0001	Individual	June	Taylor		Yes	SP3		BY HAND TO; CASTLE POINT BOROUGH COUNCIL I am attaching this letter to the Booklet provided to make comments to Castle Point Plan Regulation 19 Draft document. I request that you note my comments and objections in connection with the above mentioned draft plan. The key points I wish to raise in this response regarding the draft plan are: o Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. o North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island.											o Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. o North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. o The plan lacks a demonstrable five-	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								o The plan lacks a demonstrable five-year housing land supply, critically undermining its credibility and resilience. Legal Compliance of the Plan: For the Castle Point Plan to be legally compliant, it must satisfy the statutory obligations set out in the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF, December 2024). While I recognise the effort that has gone into preparing the Regulation 19 draft, there are several areas where, in my view, the Plan does not yet meet the legal tests of soundness and compliance, and these must be addressed before submission for examination. The above are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination: the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and											year housing land supply, critically undermining its credibility and resilience.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP,	

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								consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not meet these tests. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely on every day. However, in order to successfully argue its case for a lower housing figure, the Council has to produce the strongest possible evidence that it has considered every viable alternative. No reference to alternatives at all in the marketing material. Please note my objection and I would be happy to talk to anyone to discuss my concerns further. I have attended a few of the various meetings held but find it difficult to discuss and receive answers in regard to evidence based queries I raise.											including in relation to Canvey.	

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0384 - 0001	Individual	Pamela	McCarthy		Yes	SP3		BY HAND TO; CASTLE POINT BOROUGH COUNCIL I am attaching this letter to the Booklet provided to make comments to Castle Point Plan Regulation 19 Draft document. I request that you note my comments and objections in connection with the above mentioned draft plan. Can i say at the outset this plan cost the Council (us Council tax payers) a vast sum of money and the Response booklet is not at all user friendly for completion. Hence this letter. The Local Plan gives opportunity to develop the area of Castle Point. However, being a resident on Canvey Island since the early sixties I have a vested interest in the Island part of Castle Point and am horrified and concerned that the continuous flood risk does not appear to deter the planning for over 6000 new dwellings. The safety of island residents is of great risk not only of flooding but of any major catastrophe/ accident happening within or on the Island where evacuation might be required. The Plan has not as far as I can tell taken to account any evacuation process. The houses proposed would											o Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites is commendable and reflects strong community engagement. o North West Thundersley offers a sustainable and strategic location for growth and should be included in the Plan to better protect Green Belt sites and enable a considerable decrease in proposed housing numbers on Canvey Island. o The plan lacks a demonstrable five-	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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								add at least another 12000 (minimum) residents and it is no secret that current access on and off Canvey Island is extremely limited so I object and comment that how is the safety of even more inhabitants on the Island going to be safe in any flood or catastrophic incident. The Plan should be creating an extra highway access for the Borough onto the wider road network. I acknowledge that, the Council's approach to engagement has been constructive and but find the Regulation 19 consultation difficult to engage with due to its length and complexity. I have attempted to answer all the questions in the consultation, and would like this letter treated as my main response, as it is far easier for me to outline the strength of my views and include greater detail in this way. On the subject of disaster or heavy downpours canvey way is the only safe entry and exit to canvey island should such an event occur we could use essex way to rayleigh or southend but the elephant in the room is with such torrential downpours most manholes are lifted by the pressure of floodwater; therefore making use of										year housing land supply, critically undermining its credibility and resilience.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP,	

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								such a route will very difficult indeed, and of course the constant flooding of the underpass thus closing off any use for escape, which leaves only one route for evacuation canvey way. This safety aspect really needs to be addressed. With regard to Green Belt. Green Belt is not just a planning designation , many local Green Belt sites are a cherished part of our landscape and heritage. They must be protected wherever possible. However, I fear that the Plan in its current form will render this attempt at protection by the Council meaningless. Homes are important but so also is our green belt. The key points I wish to raise in this response regarding the draft plan are: o Castle Point faces serious challenges, including surface water flooding, infrastructure strain and pressure to accommodate growth. o The proposed allocation of the vast number of homes to Canvey Island is excessive given its environmental, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. o The Council's removal of several Green Belt sites is commendable												including in relation to Canvey.	

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								spatial strategy, also falls short of what is required. Paragraph 32 of the NPPF requires that plans be informed by a robust and proportionate evidence base. Where is this evidence based???? The above are not academic concerns; they are the legal safeguards that ensure development is sustainable, justified, and in the public interest. Soundness of the Plan To be found sound at examination: the Castle Point Local Plan must satisfy the four statutory tests of soundness as defined in paragraph 35 of the NPPF. These are, positively prepared, justified, effective, and consistent with national policy. While I acknowledge the considerable work undertaken by Castle Point Borough Council, I remain concerned that the Plan does not meet these tests. There is absolutely no doubt that the housing target for Castle Point imposed centrally by the Government is impossible to meet. It would in fact be impossible for our Borough to cope with a number of houses anywhere near that target without losing its character and causing critical failure of the local infrastructure residents rely											

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0385 - 0001	Individual	Lukas	Burry		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0385-0002	Individual	Lukas	Burry		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk					A	The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sounded?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0385-0003	Individual	Lukas	Burry		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.	No			A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkept and will detail who is responsible for this.	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Canvey-is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface								

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											water flood risk, the lake serves as an important rainwater depository, and current poor water quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0386-0001	Individual	Delia	Searle		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not					A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites".	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											appropriate for Canvey Island's unique geography and drainage infrastructure.						Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In	

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																		addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to	

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																		site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0386-0002	Individual	Delia	Searle		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0386-0003	Individual	Delia	Searle		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake	No			A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the	N

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											exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage -	capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.													maintenance of the lake is upkeep and will detail who is responsible for this.	

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisa tion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Why?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
											yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								

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0387-0001	Individual	Bernard	Searle		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.					A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0387-0002	Individual	Bernard	Searle		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk					A	The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0387-0003	Individual	Bernard	Searle		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.				A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkept and will detail who is responsible for this.	N

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											water flood risk, the lake serves as an important rainwater depository, and current poor water quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0388 - 0001	Individual	Tracy	Searle		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not					A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites".	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											appropriate for Canvey Island's unique geography and drainage infrastructure.						Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In	

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																		addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to	

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																		site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0388-0002	Individual	Tracy	Searle		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0388-0003	Individual	Tracy	Searle		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake				A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the	N

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											yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								

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0389-0001	Individual	Harvey	Burry		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.					A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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0389-0002	Individual	Harvey	Burry		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk					A	The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

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											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0389-0003	Individual	Harvey	Burry		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.				A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkept and will detail who is responsible for this.	N

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											Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface								

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											water flood risk, the lake serves as an important rainwater depository, and current poor water quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0390 - 0001	Individual	Stacy	Sibthorp		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not						Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites".	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											appropriate for Canvey Island's unique geography and drainage infrastructure.						Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In	

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0390-0002	Individual	Stacy	Sibthorp		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
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0391-0001	Individual	Perry	Hall		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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0391-0002	Individual	Perry	Hall		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk						The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

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											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0391-0003	Individual	Perry	Hall		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.					Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkept and will detail who is responsible for this.	N

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											Canvey-is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface								

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											water flood risk, the lake serves as an important rainwater depository, and current poor water quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0392-0001	Individual	Dave	Wahs		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not					A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites".	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											appropriate for Canvey Island's unique geography and drainage infrastructure.						Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In	

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
																		addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to	

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																		site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0392-0002	Individual	Dave	Wahs		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0392-0003	Individual	Dave	Wahs		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake				A	Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the	N

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											exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage -	capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.													maintenance of the lake is upkeep and will detail who is responsible for this.	

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisa tion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par ti ci pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
											yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								

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0393 - 0001	Individual	Terence	Salter		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0393 - 0002	Individual	Terence	Salter		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk						The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

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											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0393-0003	Individual	Terence	Salter		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Effective, Consistent with national policy							No five year housing land supply North west thundersley was not considered	Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will	N

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																		provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards.	

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																		For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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0394-0001	Individual	June	Dra per		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0395-0001	Individual	Joanne	Slator		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			B - see 0395-0002	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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0395-0002	Individual	Joanne	Slator		Not Stated	For eword	Not stated		Not Stated		No one should have to make a Local Plan again. It is a monumental waste of time and many Castle Point Officers are only interested in Londoners and money. Not locals. Not environment. The process has been designed to lock people out from giving views.		No			No ne	Does not feel we need a local plan	Comments noted.	N

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0396-0001	Individual	John	Stodell		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No				Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0397-0001	Individual	John	Harding		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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0398-0001	Individual	Megan	Barr ett		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0399-0001	Individual	Jacqueline	Benbrook		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0400-0001	Individual	Paul	Dawes		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No			A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0401 - 0001	Individual	Margaret	Shaw		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No				Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0402-0001	Individual	Janet	Parish		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0402-0002	Individual	Janet	Parish		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the						The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

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											East at risk with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0403-0001	Individual	Lesley	Thompson		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in	

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																		the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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0403 - 0002	Individual	Lesley	Thompson		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0404 - 0001	Individual	Janice	Barnes		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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																		<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	

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																		considered through the SFRA.	
0404 - 0002	Individual	Janice	Barnes		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0405 - 0001	Individual	Nicola	Turpin		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the	

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																		reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA	

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																		and IDP, including in relation to Canvey. SuDS Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0405 - 0002	Not Answered	Nicola	Turp		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0406-0001	Individual	Carol	Turpin		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0406-0002	Not Answered	Carol	Turp		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the						The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											East at risk with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0407-0001	Individual	Deirdre	Perry		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in	

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																		the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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0407 - 0002	Not Answered	Deirdre	Perry		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0408 - 0001	Individual	Trevor	Higgins		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	

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																		<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	

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																		considered through the SFRA.	
0408 - 0002	Individual	Trevor	Higgins		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0409 - 0001	Individual	Betty	Higgins		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No			A	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the	

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																		reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA	

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																		and IDP, including in relation to Canvey. SuDS Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0409-0002	Individual	Betty	Higgins		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.					A	The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
0410-0001	Individual	Margaret	Bowden		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, consistent with national policy	It is not consistent with national policy, as it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt/ Grey Belt sites added, and the exclusion of the North West Thundersley site, the NPPF guidelines state development should be directed away from areas at highest risk of flooding, SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0410-0002	Individual	Margaret	Bowden		Yes	C4	No				The proposed 3316 urban homes for Canvey is not resident led, and the number of Canvey West homes puts residents in the						The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											East at risk with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0411-0001	Individual	David	Hurrell		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0412-0001	Individual	Christopher	James		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No				Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the	N

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											landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.									NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land	

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																		supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to	

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																		and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within	

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																		the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several	

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																		clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green	

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																		Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0413-0001	Individual	Iris	Burl		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0414-0001	Individual	Jess	Anderson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0415-0001	Individual	Byron	Anderson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0416-0001	Individual	Sarah	Attrill		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0417-0001	Individual	James	Attrill		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0418-0001	Individual	A	Newman		Yes	Whole Plan	N/A	Not Stated	Yes		Those responsible for preparing the draft have recognised, addressed and attempted to provide workable solutions to the challenges and problems faced in Castle Point whilst complying with the NPPF. Specifically: The need to build more homes, the high density of population and homes already in Castle Point far exceeding most of Essex, the excessive congestion on roads and excessive loading on public transport in the area, failure by successive governments to construct a third road on to Canvey Island, already identified high risk of flooding across Castle Point and adjoining Basildon by the retention of Green Belt along the A130 corridor, The need to retain Green Belt as an area for recreation and to provide facilities tenable this including Horse Stabling and horse riding which currently exist, are extensively used by residents and add to the desirability of living in this area. As a resident in Castle						Castle Point Plan is sound and thanks to officers for addressing the concerns of residents	Support noted.	N

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											Point for over 50 years I'd like to register my gratitude to the current team preparing the draft for acting on the concerns of the majority of residents in Castle Point.								
0419-0001	Individual	Paul	Norton		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0420-0001	Individual	Lamie ce	Noonan		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0421-0001	Individual	Michael	Noonan		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0422-0001	Individual	Michael	Harvey		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0423-0001	Individual	Natasha	Helth		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0424-0001	Unable to process due to lack of contact details																		
0425-0001	Individual	June	VincenJ ones		Yes	Had 2	No	You need to look at alternative areas - out of Hadleigh as we are a grid-lock area already.	No	Justified, consistent with national policy	You are ignoring Greenbelt / Grey areas, brown areas. Why not Thundersley Site. Do not want any housing on the Salvation Army Land - it is farmland, Salvation army want to sell for Housing, they have always been supported locally. As is the	Reduce the housing target for this area, particularly Hadleigh/	No			A	Does not support building on HAD2, should consider North West Thundersley instead.	Policy HAD2 does not include any housing development proposals and encourages the use of the area for recreational/agricultural	N

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											need to protect Hadleigh Castle.							purposes. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0426-0001	Individual	L	MCoverley		Yes	B3	Yes	Not Stated	Yes		Not Stated		No			A	Policy B3 is legally sound and compliant	Support noted	N

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0427-0001	Individual	Susan	Smith		Yes	Had 2	No	North Thundersley would be a much more viable proposition! The land for prospective development is too close to a natural heritage site, Roman Fort etc. The land around the Castle is unstable and could be seriously affected by close building works. Also drainage would be a problem! Added to which, the lack of suitable infrastructure such as congested roads, lack of doctors / dentists / schools - all over crowded and unable to cope already before thousands more houses are built in the area! Farmland is needed, despite what the S.A say, the soil is more than adequate to grow all kinds of crops (rather than importing from abroad!!) We must look after our heritage site - after all we are Castle Point!!	No	Justified, consistent with national policy	I agree that Had2 policy is about protecting greenbelt / farmland and not suitable for development. But the plan for over 6000 homes puts the site at risk particularly our very important heritage site. What about nature conservation ecological restoration habitat creation? The salvation army purport to be there for the local community but are happy to sell land that will cause distress destruction of the above! Shame on them!!	Add North West Thundersley as a more viable solution where traffic can be easily controlled along the A127 (putting in a roundabout) and less congestion on A13 and minor routes.	No				Support for policy HAD2 but concern that the plan for over 6000 homes puts this site at risk for development and suggests north west thundersley should be considered.	Support noted. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	N
0428-0001	Individual	Doreen	Weston		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0429-0001	Individual	Ellis	Clark		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0430-0001	Individual	Imogen	Clark		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0431-0001	Individual	Rebecca	Bruton		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0432-0001	Individual	David	Bruton		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0433-0001	Individual	Elizabeth	Hunt		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0434-0001	Individual	Jacqueline	Beech		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0435-0001	Individual	Steve	Beech		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0436-0001	Individual	Craig	Borg		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0437-0001	Individual	Kelly	Borg		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0438-0001	Individual	Terrance	Doddall		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0439-0001	Individual	Stephanie	Rawlinson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0440-	Individual	Sharon	Hampson		Yes	Whole	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0001						Plan													
0441 - 0001	Individual	Nick	Hampson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0442 - 0001	Individual	Patricia	White		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0443 - 0001	Individual	Nicki	Curling		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0444 - 0001	Individual	Ian	Gummery		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0445 - 0001	Individual	Joshua	Lillis		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0446 - 0001	Individual	Simon	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0447 - 0001	Individual	Abigail	Sellick		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0448 - 0001	Individual	Johanna	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0449 - 0001	Individual	James	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0450 - 0001	Individual	Daniel	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0451-0001	Individual	Jacob	Hudson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0452-0001	Individual	Patrick	Flaherty		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0453-0001	Individual	Susan	Baillie		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0454-0001	Individual	Jenny	Levey		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0455-0001	Individual	Derek	Oliver		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0456-0001	Individual	Jane	Oliver		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0457-0001	Individual	Paul	Reed		Yes	Had2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recreational, nature recovery, biodiversity, agricultural, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage site the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.				A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0458-0001	Individual	Laura	Robinson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0459-0001	Individual	Charlie	Crow		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0460-0001	Individual	Ethan	Faulkner		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0461-0001	Individual	Tegan	Wilkinson		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0462-0001	Individual	Susan	Pitcher		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0463-0001	Individual	Georgia	Pitcher		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0464-0001	Individual	John	Cheesman		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0465-0001	Individual	Caroline	Forsyth		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0466-0001	Individual	Deborah	Haynes		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0467-0001	Individual	Diane	Wylde		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No			A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0468-0001	Individual	Philip	Boures		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance					Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a	N

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											sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6	dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.							management plan, it will ensure that the maintenance of the lake is upkeep and will detail who is responsible for this.	

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											Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water. quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								

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0468 - 0002	Individual	Philip	Boures		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0468-0003	Individual	Philip	Bou rnes		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk						The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0469-0001	Individual	Colby	Cunningham		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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																	are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in	

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																		the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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0469-0002		Colby	Cunningham		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0469-0003		Colby	Cunningham		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.					Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the maintenance of the lake is upkeep and will detail who is responsible for this.	N

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											The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage - yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating									

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											a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water quality threatens users, animals and biodiversity. However, without concrete delivery mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0470-0001	Individual	Cheryl	Ray		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state		No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Design

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											development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August	

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																		2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. SUDs Policy SD3	

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																		covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0470-0002		Cheryl	Ray		Yes	C4	No				The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0470-0003		Cheryl	Ray		Yes	C7	No	Failed to consider strategic alternatives like North West Thundersley. No Credible five-year housing land supply.	No	Justified, Consistent with national policy, Effective	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000. LAKE DELIVERY FRAMEWORK: Establish firm 2 year timeline for comprehensive lake dredging with dedicated funding and delivery agency. Create annual maintenance dredging schedule with long-term budget allocation. Set measurable targets for lake	No				Policy C7 Lacks clear delivery mechanisms and ongoing maintenance commitments No maintenance in 10 years despite the 6 point plan Agree with the vision for improving canvey lake Engage with friends of Canvey Lake	Comments noted. The purpose of Policy C7 is to improve the space as a multifunctional green space and include a long term management plan to ensure its upkeep is maintained. By requiring a management plan, it will ensure that the	N

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											exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure. An unsound plan will put all Greenbelt sites at risk to speculative development. All; Greenbelt .sites on Canvey West need total protection from government intervention. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey-is not resident led. Canvey West homes puts residenets in the East at risk with emergency evacuation procedures. This over development policy for Canvey will affect highways and traffic, the lack of infrastructure, sewage and poor drainage system on Canvey, and enhance the flood risks to Canvey Lake. Policy C7 is not effective- because it lacks clear delivery mechanisms and ongoing maintenance commitments. The 2015 Canvey Island 6 Point Plan recommended dredging, to increase lake capacity for flood storage -	capacity increase and water quality improvements. Designate responsible agency for ongoing lake management with annual progress reporting and community consultation. COMMUNITY ENGAGEMENT: Engage with Friends of Canvey Lake, a community group, with 2.5k members championing the reset of Canvey Lake to its pre-2010 conditions, to ensure resident-led lake management improvements.													maintenance of the lake is upkeep and will detail who is responsible for this.	

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											yet nearly 10 years later, these critical recommendations remain undelivered. Policy C7 repeats the same promises without addressing why previous commitments failed, providing concrete delivery timelines, funding sources, or ongoing maintenance schedules. I do agree with Policy C7's vision for improving. Canvey Lake - delivering increased capacity through dredging for flood water storage, reducing flood risk, creating a long-term management plan, improving water quality, and enhancing habitat. Canvey Island suffers from high surface water flood risk, the lake serves as an important rainwater depository, and current poor water.quality threatens users, animals and biodiversity. However, without concrete delivery-mechanisms and learning from the 6 Point Plan's decade long delay, Policy C7 risks becoming another unfulfilled, promise while flood risks to Canvey Lake continue to increase.								
0471 - 0001	Individual	Paul	Spagnol		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N

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0472-0001	Individual	Josephine	Spagnol		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0473-0001	Individual	Peter	Prockter		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0474-0001	Individual	Carol	Prockter		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0475-0001	Individual	Laura	Tice		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant,	Support noted.	N
0476-0001	Individual	Vincent	Tice		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant,	Support noted.	N
0477-0001	Individual	Karen	Smith		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0478-0001	Individual	Sheila	Andrews		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant,	Support noted.	N
0479-0001	Individual	Susan	Huggett		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
0480-0001	Individual	Grace	Walker		Yes	Not Stated	N/A	Not aware of the legal requirements therefore cannot comment	Not Stated		Have not seen the regulations regarding to soundness so cannot comment without sight of some.						Not able to comment without seeing the regs	Noted.	N
0481-0001	Individual	Brett	Stone		Yes	SP3	No	No building should be started on housing until adequate infrastructure for said development has been completed ie new sewage works, schools / collages,	No	Positively Prepared, Justified	I don't think local need is that great. We will just help solve another areas problem, thus increasing our own over time.	Scrap it			All	A	No building should be started on housing until adequate infrastructure for said development	<u>Housing Need</u> Approach to Housing Need set out the Housing Topic Paper.	N

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								flood mitigation, doctor surgery, roads, parking. I do not think Canvey Island is suitable for any new developments until at least one more road on and off is completed. We also need to keep some areas untouched by developers for wildlife, the environment and peoples sanity and wellbeing.									has been completed ie new seage works, schools / collages, flood mitigation, doctor surgery, roads, parking. I do not think Canvey Island is suitable for any new developments until at least one more road on and off is completed. We also need to keep some areas untouched by developers for wildlife, the environment and peoples sanity and wellbeing. I don't think local need is that great. We will just help solve another areas problem, thus increasing our own over time.	<u>Infrastructure</u> Infrastructure matters are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). <u>Flooding</u> Flood risk covered in policies and the supporting Strategic Flood Risk Assessment (SFRA).	
0482-0001	Individual	Kim	Stone		Yes	SP3	No	Infrastructure - Canvey Island is a flood plain. The Flood Risk Area 3a is officially considered a Flood Plain in the sense required by LUC Planning and Environmental Policy. Much of Canvey lies nearly 2 metres below the daily high tide level of the Thames Estuary. Our drainage is inadequate. By building many more homes the Island cannot sustain the parking, the roads, the	No	Not Stated	Infrastructure and services totally inadequate	Needs to be scraped				A	Infrastructure - Canvey Island is a flood plain. The Flood Risk Area 3a is officially considered a Flood Plain in the sense required by LUC Planning and Environmental Policy. Much of Canvey lies nearly 2 metres below the daily high tide level of the Thames	Flooding and infrastructure covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey.	N

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								jobs, the services ie)Doctors, Dentists, Schools. One more road access to and from the Island is needed. There is at present over 40,000 people living on the Island, with more housing comes more vehicles. There is already a job shortage, many youngsters failing to seek employment and you will be adding more. Our doctors and dental surgeries cannot cope with the volume of people at present. As all of the above states Canveys needs, unless the infrastrcutre is sorted the current plan is unsound and does not meet the required legal requirements and is unsafe.									Esturary. Our drainage is inadequate. By building many more homes the Island cannot sustain the parking, the roads, the jobs, the services ie)Doctors, Dentists, Schools. One more road access to and from the Island is needed. There is at present over 40,000 people living on the Island, with more housing comes more vehicles. There is already a job shortage, many youngsters failing to seek employment and you will be adding more. Our doctors and dental surgeries cannot cope with the volume of people at present. As all of the above states Canveys needs, unless the infrastrcutre is sorted the current plan is unsound and does not meet the required legal requirements and is unsafe.		

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0483 - 0001	Individual	S	D Wat han		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No		Adoption, Future revisions	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0484-0001	Individual	J	C Wat han		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No		Adoption, Future revisions	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	

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0485 - 0001	Individual	Teresa	Goodman		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025.	Y - Policy SD3(3) 'Proposals must demonstrate how the SuDS feature(s) reflect and respond to the constraints of the specific geographic location , site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design

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																	and drainage infrastructure.	<u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment	Guide for Essex, the Castle Point Strategic Flood Risk Assessment (SFRA) and recommendations/advice from statutory bodies (including EA, Essex LLFA).'

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																		(SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0485-0002	Individual	Teresa	Goodman		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk		No				The number of Canvey West homes puts residents in the East at risk with	Needs of emergency services considered in the supporting	N

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											with emergency evacuation procedures.						emergency evacuation procedures	Infrastructure Delivery Plan (IDP).	
0486 - 0001	Individual	Lorraine	Buckley		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.	No				Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex

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																	are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in	and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	

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0486 - 0002	Individual	Lorraine	Buckley		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.		No				The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0487 - 0001	Individual	Graham	Thomas		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery	<u>Y - Policy SD3(3)</u> 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council'

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																	should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	s SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

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																		<u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA and IDP, including in relation to Canvey. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been	

ID Ref	Individual/Organisation/Age nt?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/ Paragraph No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
																		considered through the SFRA.	
0487-0002	Individual	Graham	Thomas		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N
0488-0001	Individual	Gilligan	Boucher eau		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites".	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050.					Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site	<u>Housing Supply – Government Housing Target and Standard method</u> Through robust technical evidence as outlined in the Housing Capacity Topic Paper August 2025, CPBC has identified through a housing strategy of urban intensification	Y - Policy SD3(3) 3. Proposals must demonstrate how the SuDS feature(s) reflect and respond to the site

ID Ref	Individual/Organisation/Agent?	First Name	Last Name	If organisation - name	Has agreed to publication of Name /Comments?	Policy/Para No.	2a. Legally Compliant?	2b. If No, explanation	3a. Sound?	3b. Positive/Effective/Justified/Consistent?	3c. Explanation	4. Suggested modifications	5. Wish to participate in exam	6. Why?	Supporting Evidence supplied?	Option A, B or C	Summary	Officer Response	Mods Required
											Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.						selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley. NPPF guidelines state development should be directed away from areas at highest risk of flooding. SUDS measures are not appropriate for Canvey Island's unique geography and drainage infrastructure.	and regeneration sufficient sites to 6,196 homes through the planned period. CPBC realises that this is considerably less housing than the Standard Method housing need but considers based on the evidence that this is a realistic housing delivery Castle Point's approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <u>Housing Supply – 5 Year Supply</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>North-West Thundersley</u> Northwest Thundersley was considered but not preferred. The SOCG between CP and ECC set out the	circumstances, landscape character and the green-blue infrastructure network, and have regard to Essex County Council's SuDS Design Guide for Essex and the Castle Point Strategic Flood Risk Assessment (SFRA).

ID Ref	Individual/Organisation/Age nt?	Firs t Na me	Last Na me	If orga nisat ion - nam e	Has agree d to publi catio n of Name /Com ment s?	Poli cy/ Par a No.	2a. Leg ally Co mp lia nt?	2b. If No, explanation	3a. So und?	3b. Positive/Eff ective/Justif ied/Consist ent?	3c. Explanation	4. Suggested modifications	5. Wi sh to par tici pat e in ex am	6. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d
																		reasons why the site is not a preferred alternative for allocation and also the August 2025 North West Thundersley transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Consideration of All Sites</u> All reasonable option sites were considered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA). <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Flooding and infrastructure</u> covered by policies and supporting evidence in the form of the SFRA	

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																		and IDP, including in relation to Canvey. SuDS Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
0488-0002	Individual	Gilligan	Boucher eau		Yes	C4					The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures	Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	N

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0489-0001	Individual	Robert	Gle nister		Yes	Had 2	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	It is not consistent with national policy, it doesn't meet the housing target for Castle Point, and site selection ignores Greenbelt / Grey Belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Greenbelt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley site. I do totally agree with Had2 Policy, for the Hadleigh Farm area, which states this site as environmental, recretaional, nature recovery, biodiversity, agricultrual, farming activities, nature conservation, SSSI, Ramsar site ecological restoration, habitat creation and connectivity, protection as an open space, promoting the heritage sitem the Castle, and whatever is planned for this site in the future does not have a significant impact on the landscape or the Greenbelt. I also agree the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but this unsound plan for 6,200 homes, put's the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 homes. Reduce the Urban Housing target to 3500 from 6200, with Canvey at 1050, Hadleigh at 305. Total housing target of 11,000.	No		Adoption, Future revisions	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	Housing Need The Council undertook a Local Housing Needs Assessment in December 2023 which identified a need for around 255 homes per year in Castle Point. Changes to the NPPF in December 2024, removed the ability for Councils to set a lower housing target, than that set out by the Standard Methodology. However, taking into account the extensive evidence base that has been prepared to support the Castle Point Plan, it is not considered appropriate, sustainable or in keeping with the NPPF when read as a whole, to deliver this scale of growth in Castle Point. The Castle Point	N

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											Hadleigh farmland site at risk to speculative development, with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and use of grey belt first. Any development on this site effects both Hadleigh and the neighbouring area of Leigh on Sea. I can fully support this Had2 Policy with no housing development ever on this farmland site, and I hope the Salvation Army agree with this direction. We need a C6 policy for this farmland site, the South Hadleigh Green Lung to protect and enhance a strategic green infrastructure asset between Hadleigh and Leigh on Sea.							Plan Regulation 19 Draft makes provision for around 364 new homes a year (around 6,196 homes to 2043) which is sufficient to meet the need for housing arising from the Local Housing Needs Assessment but is insufficient for the standard methodology requirement for housing set out in the NPPF 2025. Five Year Housing Land Supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a	

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																		new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver	

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																		231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out in the Housing Capacity Topic Paper, it was not included within the plan. Furthermore, it is not considered that the site is deliverable for	

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																		those reasons set out in the SOCG between CP and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development.	

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																		These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green	

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																		Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD6	
0490-0001	Individual	Neil	Pitcher		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No				Castle Point Plan is sound and legally compliant,	Support noted.	N
0491-0001	Individual	John	White		Yes	Whole Plan	Yes	Not Stated	Yes		Not Stated		No		All		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0492-0001	Individual	Janet	Mitchell		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	

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0492 - 0002	Individual	Janet	Mitchell		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent	N

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0492-0003	Individual	Janet	Mitchell		Yes	Forword					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								
0493-0001	Removed as no permission given to publish.																		
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0494-0001	Individual	Deborah	Cox		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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0494-0002	Individual	Deborah	Cox		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent	N

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0494 - 0003	Individual	Deborah	Cox		Yes	Forward					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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0495 - 0001	Individual	David	Gubb		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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0495 - 0002	Individual	David	Gubb		Yes	Hou5					The plan has included Thorney Bay development for 173 homes, so what make the H031 site any different. Policy Hou5 states, new park homes will only be supported on existing Park Home sites. All our homes are robust, make provision for cold weather and risk from flooding, but Hou5 should allow further development which improves the overall site environment for the local residents.					A	The plan allocates 173 homes at Thorney Bay so Kings Park should be allowed HOU5 should allow further development which improves the site environment for local residents	Thorny Bay The 173 homes at Thorney Bay are as a result of an existing planning permission and are not allocated as part of this Plan as they already have permission. They are however included within the existing commitments. Full details of the 480 existing commitment can be found within the housing trajectory at Appendix 2 of the Housing Topic paper (August 2025). Kings Park Within the withdrawn local plan, the site adjacent to the eastern boundary of Kings Park was included as a housing allocation. However, that plan was withdrawn and that site remains within the extent	N

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0495 - 0003	Individual	David	Gubb		Yes	Forward					I would like to introduce myself as Chair of the Kings Park Village Residents Association. Our committee have recently been: inundated with enquiries from residents asking how they can object to the building of 3,316 homes in Canvey Island and emphasise the need for a third road off the island. As you must be aware we					A	Kings Park residents feel discriminated against during the consultation as they do not have access to the internet and felt events were poorly advertised.	Comments noted. The council has prioritised inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement.	N

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											are a retirement park, and as such many of our residents do not have access to social media or the internet where the majority of the information on this matter has been published and the meetings were poorly advertised. The residents feel that they are discriminated against in that they are limited in having a say in these matters and the committee are in agreement with them.								

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0496 - 0001	Individual	Sandra	Crowhurst		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with national policy	The draft local plan is not consistent with national policy. Doesn't meet the housing target for Castle Point. Site selection ignores Greenbelt/ Grey Belt against new NPPF guidelines. The draft local plan is not justified. Site selection strategy is biased and predetermined towards a "no greenbelt build policy". Site selection is based on the "over development of Brownfield sites". Not considered all sites, no Greenbelt/ Grey Belt sites added, with the exclusion of North West Thundersley, and H031. The policy is based on the total over development of urban sites, especially on Canvey. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures. There are 870 homes on Kings Park with approximately 1,400 residents; we have serious concerns as to how they would be able to evacuate the island in the event of a flood or major incident. Our position on the island	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7 500 homes. Add the Greenbelt / Grey Belt site of Kings Park HO31. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050. Total housing target of 11,000.	Yes			A	No 5YHLS and failed to consider strategic alternatives like North West Thundersley. Not consistent with national policy and is predetermined to towards no greenbelt Over development of brownfield sites No Green/Grey Belt sites considered Canvey west homes put Canvey East homes at risk with emergency evacuation procedures Need for a third road to be included in the plan.	5YHLS The Council is currently relying on the 1998 Adopted Local Plan which does not have up to date policies on housing supply, consequently, the five-year housing land supply position is calculated using the Government's Standard method. However, once a new plan is place, the housing target is set by that plan and not the Government's Standard method. The five-year housing land supply position is calculated from that target. It is therefore important that we continue to progress the Castle Point Plan. The Castle Point Plan will provide a rolling 5 year housing land supply. It should be noted that it is	N

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											means that we would have great difficulty getting off the park and onto the main route off the island as they would already be gridlocked. Then there is the issue of those residents who are disabled, house-bound/bed-bound. This would obviously increase the time needed for evacuation. This highlights once again the need for a third road off of Canvey and it is our opinion that this must form part of the Local Plan. The majority of Canvey's residents are of the same opinion.							common for stepped increases in housing delivery to be set out and agreed in plans, as stepped changes respond to the capacity of the housing market to respond to and deliver against new housing targets. In the first ten years of the plan the Council's aim is to deliver 231 homes per year on average. It then expects to step up delivery again from year 11 onwards to 555 homes per year on average. It is these delivery rates that will be used to calculate the five-year housing land supply position once the Castle Point Plan is adopted, and from that point onwards. For further information please see housing topic paper.	

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																		Strategic alternatives North west Thundersley is in the Greenbelt. For those reasons set out in the Housing Capacity Topic Paper it was not included within the plan. Furthermore, it is not considered that the site is deliverable for those reasons set out in the SOCG between CPBC and ECC and also the August 2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. Consideration of All Sites All reasonable option sites were considered in the Strategic Land Availability Assessment	

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																		(SLAA) and the Sustainability Appraisal (SA). Green/Grey Belt The Council has undertaken a Green Belt Review in accordance with the requirements of the Governments guidance. After a thorough review, backed up by strong evidence (as set out in the Housing Capacity Topic Paper), the Council has found several clear reasons, when considered together, to rule out Green Belt sites for development. These are not limited to; Evidence of the value of the natural environment in Castle Point, Evidence of the value of heritage assets in Castle Point, Evidence of the role of greenfield sites	

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																		in providing flood mitigation, Evidence of the capacity of the highway network in and around Castle Point, Evidence of the impact of the Green Belt sites that were promoted to us would have on the landscape and on the number of additional cars that will enter the local highway network and Evidence that parts of our Green Belt fulfil a strong Green Belt purpose. Green Belt/Grey belt is addressed under policy GB2. Where our Green Belt Review indicates that a site may potentially be Grey Belt, it does not automatically mean that it is an appropriate development site for those reasons set out above.	

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																		Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/ Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions. Access improvements for Canvey are a strategic matter which cannot be addressed through the Castle Point Plan alone, as any growth is only a proportion of the demand for those access improvements. The bulk of the demand come from the existing 16,000 households on Canvey.	

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