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											Castle Point Local Plan was legally compliant and sound and capable of adoption. 5.8 The Inspector’s report sets out main modifications (MM) required, in order to enable the Plan can be adopted. To revise the local housing need figure to reflect changed input figures; To set a stepped housing requirement to reflect the likely delivery of homes in the plan period, and the significant uplift in housing land supply proposed which will take some time to deliver; To amend the Green Belt Policies so that unnecessary duplication is avoided and to make them effective; To delete Local Policy GB4 Limited Infill – Special Policy Areas as it would not be effective and is inconsistent with national policy for the Green Belt; To alter Policy HO7 Gypsy, Traveller and Travelling Showpeople to include a site allocation, so that the Plan makes provision to meet the specific need for Gypsies and Travellers arising in Castle Point during the plan period; To make detailed adjustments to particular site allocations; To delete the proposed								

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											allocation of employment land at the Manor Trading Estate, as exceptional circumstances have not been demonstrated for releasing the site from the Green Belt; and A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy. 5.9 Importantly, within the examination of the wLP the Inspector considered the review of the Borough’s Green Belt boundaries and the methodology they adopted was clear and adequate. 5.10 It was noted at Paragraph 42 of the Inspector’s Report, that the assessment of available land within the urban area (SHLAA 2018) indicated that around 53% of the housing need (5,325 for the plan period) could be met within the urban area. As such, it would not be possible to rely on increasing the supply of housing within the urban area to avoid altering the boundaries of the Green Belt to meet housing need. 5.11 The Inspector also noted the need for housing, issues with affordability and the serious shortfall in provision of affordable homes, was a pressing								

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											matter then (intensified to the present day). They ultimately concluded that strategic-level exceptional circumstances existed to alter the Green Belt boundary in order to meet the housing needs in the interests of the proper long-term planning for the Borough. 5.12 Disappointingly, the Council resolved to withdraw the 2018-2033 Local Plan and start a new plan, focusing on protecting the Green Belt. 5.13 The Site was proposed to be released from the Green Belt and allocated as part of a wider site allocation for residential development, as part of a masterplan within the wLP ‘New Castle Point Local Plan 2018 – 2033 (Policy HO20)’. The policy, referred to as Local Policy HO20 The Chase, Thundersley, sought to allocate 28ha of land off Kiln Road, Thundersley, as identified on the Policies Map, and was allocated for residential purposes, to deliver around 412 homes by 2033. Amongst other policy requirements, the policy expected a masterplan to be prepared within six months of the adoption of the Plan, to establish the capacities of development parcels within the overall site.								

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											5.14 The proposed allocation, within the wLP was supported by a robust and reasoned evidence base, used to inform the proposed development plan. As set out above, the wLP was considered to be sound by the Inspector. 5.15 Importantly, whilst a planning application on the Site is forthcoming, we refer to a recent planning appeal decision on land further east on The Chase (ref. APP/M1520/W/24/3356256). The appeal for outline planning permission for 47 new dwellings on land east of Chase Mews and west of 310 The Chase, Benfleet was allowed on 6th August 2025, confirming that the site, a parcel within GB12 holding that Privo’s Site is situated, was suitable for residential development in terms of a lack of physical, ecological, environmental, or heritage constraints. Such assessment work was reviewed by the relevant statutory consultees and other stakeholders through the consideration of this application. 5.16 The Site’s potential suitability, availability and achievability was considered through the Council’s Strategic Land Availability Assessment (July 2025) (SLAA). 5.17 The SLAA considered								

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											the site in relation to 24 different suitability criteria. In relation to all criteria, with the exception of Local Wildlife Sites and Badger Consultation Zone noting further investigations were required, the SLAA suggested the site was suitable. Despite this, the SLAA concludes the suitability of the Site for residential development was considered unknown. 5.18 The SLAA also applies a scoring system through which sites are awarded a value relating to each one of the 24 suitability criteria. The Site scored a total of 45 using this approach, out of a maximum score of 82. This score is greater than several sites that are proposed to be allocated for residential development through the DLP, such as Land to the west of Canvey Island (score of 40). Whilst it is not considered that the process of determining site allocations can be broken down to a basic quantitative scoring exercise, these results and the conclusions in respect of the Site's suitability, is concerning. Particularly in the context of a DLP which allocates insufficient land to meet housing needs, and claims it is not possible to meet development needs in full. 5.19 One of the reasons								

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											suggested by the Council's Housing Capacity Topic Paper (2025) as to why the DLP fails to meet the Borough's minimum housing requirement, is the lack of any Green Belt sites that are capable of being considered suitable from a transport or accessibility perspective, in terms compliance with NPPF paragraphs 110 and 115. The Topic Paper cites the justification for this stance as follows: "A site level sustainability and accessibility assessment was commissioned to consistently and robustly assess the sustainability of each Green Belt site's location on the transport network, and to determine through highway design if the site can be accessed by all users in a safe way, considering national design requirements" [12.6] 5.20 Concerns in terms of how the Site was considered as GB12 through the SA are set out in Section 3 of this representation. They are not repeated here, but are applicable to the soundness of the DLP, as well as relevant to considering compliance with the SEA Regulations. The Site is sustainable for residential development, as								

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											the wLP confirmed. 5.21 The Site is evidently suitable for development. Indeed, the Council’s own evidence base effectively concerns this. Green Belt 5.22 The last site-specific assessment of the Site’s contribution to the Green Belt purposes by the Council was through the Council’s Green Belt Review (GBR) 2018 Part One, in which the following was concluded (referred to as Parcel 6 in the 2018 GBR: “I The parcel is located in the north of the borough and is adjacent to Thundersley along its northern, southern and western boundary, with Hadleigh adjacent to the south east boundary. There is not a clear boundary between the urban settlement and the Green Belt parcel due to the presence of ribbon development along the eastern edge and through much of the centre of the parcel. Much of this development is inappropriate in the Green Belt and therefore the parcel is assessed as making a moderate contribution to Purpose 1 even though the development which exists in the parcel is of a much								

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											lower density than that included in the urban settlement. The parcel is surrounded by residential or other built development uncharacteristic to a rural location across the entire length of its boundary which, coupled with the development within the parcel itself, strongly influences the perception of this parcel being in the countryside. A minor contribution is assessed under this Purpose. The parcel is assessed as not making a contribution to Purpose 2 as development of the undeveloped parts of the parcel would result in the infilling of Thundersley and not result in the merging of Thundersley and Hadleigh, which in any event have already merged at other points outside of the parcel. ” At the strategic level this Green Belt parcel is restricting a small part of Hadleigh and Thundersley from merging, although this merge has already occurred to a significant degree in close proximity. It is a fairly isolated Green Belt pocket which is only linked to the surrounding Green Belt system to the east, but it has a role in providing a recreational resource to residents in Hadleigh and Thundersley.								

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											5.23 The relevant extract of the Council’s Green Belt Review (2018) is provided as Appendix 1. This Assessment work fed into the wLP, resulting in the site’s proposed release from the Green Belt and allocation for residential development. 5.24 The most recent Green Belt Review July 2025, builds on the 2018 GBR. The 2025 GBR assesses the parcel GB12 sub area (of which the Site is situated in) as a location for further consideration. The 2025 Assessment considers GB12 as making a weak contribution to purpose a (check unrestricted sprawl of large built up areas); performing no contribution towards purpose b (to prevent neighbouring towns merging into one another); a weak contribution towards purpose c (to assist in safeguarding the countryside from encroachment). Overall scoring a ‘WEAK’ in relation to it’s performance against the purposes of the Green Belt overall (Table 10 of the GBR July 2025). 5.25 Within Appendix C of the 2025 GBR, GB12 parcel made a weak contribution to the purposes of the Green Belt. The concluding commentary states: “If the sub-area were								

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											released it would be unlikely to significantly harm the performance of the wider Green Belt due to its self-contained nature within the built-up area of Thundersley and reflecting its isolation from the wider Green Belt. “Consideration should be given to any potential cumulative impacts arising in respect of the assessment of other sub-areas in close proximity...” 5.26 The relevant extract is provided as Appendix 2. 5.27 The Site and the wider Green Belt parcel clearly does not strongly contribute to the purposes of the Green Belt and is suitable for release from the Green Belt for residential development. As set out above, the Council’s own evidence base suggests this to be acceptable. The site is therefore considered suitable. Availability and Achievability 5.28 The Site is subject to a lack of any significant constraints to residential development, and does not require any significant additional infrastructure to be brought forward ahead of its development. 5.29 An application will be submitted for the residential development of the Site, accompanied by								

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											technical assessment work and reports which confirm the suitability of the Site for housing. This further demonstrates the Site's deliverability. 5.30 It is being actively promoted by an experienced promoter with the agreement of the landowner. There are no ownership of other legal obstacles to the Site's development for residential use. It is able to accommodate c.95 new homes through a development that would respect its edge of settlement location and the character of the area, and is available and achievable for 50% affordable housing that would be a significant benefit to the community, particularly in light of the Borough's acute affordable housing shortage. Overview 5.31 Given the scale of housing need within the Borough and the inability to meet this need without releasing land currently designated as Green Belt, the NPPF clearly supports the amendment of Green Belt boundaries in such circumstances. There are demonstrably suitable, available, and achievable sites for residential development currently designated as Green Belt								

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											under a significantly outdated Local Plan. The examination of the withdrawn Local Plan (wLP) confirmed that amending Green Belt boundaries to help meet development needs was a sound and justified approach—even under a national policy framework that was less supportive of such changes, and at a time when the Borough’s development requirements were considerably lower than they are today. The DLP’s refusal to make any alterations to the Green Belt, despite the NPPF’s clear guidance and the outdated nature of current boundaries, renders the plan manifestly unsound. 5.32 The Site is sustainable and deliverable for residential development. 5.34 The site was included in the wLP as being suitable to accommodate residential development and to be released from the Green Belt (Policy HO20). Moreover, a recent appeal decision confirmed a lack of any constraints to the development of land further east of the Site within the same GB12 parcel as the Site, concluding the development was not inappropriate in the Green Belt. This was of course through the development								

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											management process, and a more permissive approach should be taken when considering the potential allocation of Green Belt land through the plan-making process, as was undertaken in the wLP and found to be a sound strategy. 5.35 The failure of the DLP to allocate the Site must be considered in the broader context of its inability to meet identified housing needs, and the acute shortage—particularly of affordable housing—that the current draft plan would exacerbate. 5.36 The rejection of the Site in this context means the DLP is patently unsound – it is contrary to the NPPF, contributes to the Local Plan’s failure to be positively prepared, and its approach is not justified.								
0976-0001	Individual	Ian	Canon		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0977-0001	Individual	Nicola	Stevens		Yes	SP3	No	Failed to consider other alternative sites like North West Thundersley. No creditable 5 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	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, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		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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											6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections 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 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	
0978-0001	Individual	Lewis	Cannon		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0979-0001	Individual	Karen	Edwards		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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0980-0001	Individual	Daniel	Stevens		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, 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, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		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, needing planning objections 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 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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0981-0001	Individual	Megan	Stevens		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, 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		No	Not Answered	Not Answered		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, needing planning objections 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 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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0982-0001	Individual	Edward	Delahay		Yes	SP3	No	Did not consider strategic alternatives such as North-west Thundersley. The 5 year housing land supply appears not to be credible.	No	Justified, Consistent with national policy	It is not consistent with national policy - it does not meet the housing target for Castle Point and the site selection ignores Green Belt / Grey Belt against NPPF guidelines. It is not justified because the site selection is based on a strategy of "no buildings on Green Belt " and the brownfield sites appear to be over-developed, resulting in the area of North-west Thundersley being excluded. I agree with the policy and stated objectives relating to the Hadleigh farm area and also, in my opinion, given the UK is not self-sufficient in food production, it cannot afford to lose viable farm land for housing. Additionally, any development south of the A13 road would have a detrimental effect upon a main road already over-burdened with traffic for long periods during the working day. I also agree that the Had2 policy is about protecting this Green Belt site from development. The unsound plan for 6200 homes puts the Hadleigh farm at risk of speculative development	Add North-west Thundersley to the plan. This area of 187 hectares, a mixture of Green Belt and Grey Belt, is capable of providing several thousand homes and its use would help prevent increasing the housing density of other areas in Castle Point. It use would provide a housing figure closer to the government target.	No	Not Answered	Not Answered		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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											which unless planning objections prevail would cause urban sprawl. Any development of the farmland would also adversely affect the neighbouring area of Leigh-on-Sea. The area would benefit from a C6 policy (Green lung) to protect and and enhance a green asset between Hadleigh and Leigh-on-Sea. Any development of this area would reduce wildlife protection and open spaces and its proximity to Hadleigh Castle would be profoundly detrimental.							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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0983-0001	Individual	Millie	Stevens		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, 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, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		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, needing planning objections 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 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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0984-0001	Individual	Robin	Cotgrove		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	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 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	
0985-0001	Individual	kim	ellis		Yes	SP3	No	Failed to consider strategic alternatives, like north west Thundersly, and certain greenbelt infill sites in and around Benfleet. No credible five year housing plan.	No	Justified, Consistent with national policy	The draft local plan is not consistent with the national policy. It does not meet the housing target for castle point.Site selection ignores Green/grey belt against NPPF guidelines. The local plan is not justified. Site selection strategyis biasedand predetermined towards a "no greenbelt policy". Site selection is based on the "over development of brownfield sites." Not considered all sites, no greenbelt/greybeltsites added, withthe exclusion of North West Thundersly.NPPF guidelines state development should be directed away from areas at high risk of flooding. SUDS measures are not appropriatefor Canvey Islands uniquegeographyand drainage infrastructure. The 3316 urbanhomes for Canvey is not resident led. Canvey west homes puts residents in the east at risk with emergency evacuation procedures.	Add north west thundersly, and certain statigic green/greybelt in fill sites in Benfleet Reduce the urban housing target to 3500 from 6200 , with canvey Island at 1050.	No	Not Answered	Not Answered	A	Not meeting housing target No five year housing land supply North West Thundersley Green/Grey Belt Flood risk on Canvey Overdevelopment of brownfield sites	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. 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. 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 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.	

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																		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. Density The density for sites allocated within the plan has been informed by the Density and Capacity Study July 2025, please see this for further details.	
0986-0001	Individual	Lynne	Howe		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0987-0001	Duplicate representation received. See representation																		

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	0988-0001 to 0988-0010.																		
1000-0001	Agent	Sam	Hollingsworth	Rainier Developments c/o Ceres Property	Yes	Forword	No		No		1.1 These representations on the Castle Point Local Plan 2026-2043 Regulation 19 Draft ('the Draft Local Plan' or 'DLP') are made on behalf of Rainier Developments & Strategic Land ('Rainier'). 1.2 Rainier is promoting Land South of Daws Heath Road, Thundersley ('the Site') for a residential development of c.58 new homes, 50% of which are to be provided as affordable homes. 1.3 The Site is Green Belt but considered to meet the definition of grey belt as per the NPPF with reference to the guidance in PPG. It is suitable, available and achievable for residential development, and able to contribute towards meeting the Borough's acute market and affordable housing shortages. The Site, however, is not proposed to be allocated for residential development in the DLP. 1.4 The DLP in its currently form is considered to be unsound when considered against the soundness tests set out in the NPPF. 1.5 Its failure to even attempt to meet minimum housing requirement as per the NPPF renders it very		Yes	Not Answered	Yes - See attachments	B - updated attachments	Considers the plan to be unsound due to concerns regarding - not meeting the minimum housing requirement - flood risk assessment - deliverability of homes proposed - the SA - Duty to cooperate	Comments noted and response provided to specific policy comments	N

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											much contrary to national policy, and is perhaps the most immediately apparent defect, as well as its most significant. 1.6 However, there are a number of other soundness concerns evident in respect of the DLP, including in relation to its approach to considering flood risk issues as well as the deliverability of the limited number of new homes the DLP does suggest it will deliver. 1.7 Additionally, we have concerns with legal compliance, specifically vis-à-vis the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') and the Sustainability Appraisal (SA) which accompanies the DLP. 1.8 We also have concerns as to whether the Duty to Cooperate has been complied with in the preparation of the DLP. 1.9 This representation is structured as follows: Section 2 considers the DLP and the Duty to Cooperate Section 3 sets out concerns in relation to the DLP in terms of its compliance with the SEA Regulations. Section 4 considers Policy SP3 (Meeting Development Needs), and why it is considered unsound								

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											Section 5 addresses Policy DH2 (Coalescence of Settlements – Daws Heath), and why it is considered unsound Section 6 discusses the site selection process, and in particular its approach to Green Belt sites and, specifically, the Site. Section 7 sets out a summary and conclusion.								
1000-0002	Agent	Sam	Hollingsworth	Rainier Developments c/o Ceres Property	Yes	DTC	No		No		2.1 The Duty to Cooperate is a legal requirement placed on local planning authorities, county councils, and certain public bodies in England under the Localism Act 2011 and the Planning and Compulsory Purchase Act 2004. It requires these authorities to engage constructively, actively, and on an ongoing basis to maximize the effectiveness of Local Plan preparation in addressing strategic cross-boundary matters. 2.2 Key requirements of the duty to cooperate in relation to Local Plans include: Engaging with neighbouring and relevant authorities early and throughout the plan-making process on strategic matters that cross		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	Lack of evidence of Duty to Cooperate - especially needed since not meeting housing need.	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

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											administrative boundaries. Demonstrating effective joint working, which may involve joint evidence gathering, assessment, and policy development to address shared issues like housing, infrastructure, transport, and environmental impacts. Considering formal arrangements such as joint plans, agreements, or joint committees for strategic planning where appropriate. Providing robust evidence of cooperation efforts, including who was engaged, the nature and timing of cooperation, and how it influenced the Local Plan. This evidence is critical for the examination of the Local Plan. Local Plans must reflect strategic priorities, including unmet needs from neighbouring authorities where reasonable and consistent with sustainable development. 2.3 Whilst the Duty to Cooperate is not a duty to agree, Authorities should make every effort to cooperate. 2.4 Castle Point Borough is part of a wider housing market area that includes the administrative areas of Basildon, Rochford, Southend-on-Sea and Thurrock. This geography is								

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											particularly germane in the context of the Duty to Cooperate, given the DLP claims it is unable to meet the Borough's housing needs in full. Indeed, it is clear from Policy SP3 that the DLP will fall a long way short of meeting minimum housing needs in the early years of the plan in particular – less than a third of its minimum requirement in the first five years. 2.5 Given this, we would have expected to see clear evidence that the Council has engaged positively and proactively with its neighbours within the housing market area to seek to determine how the level of need the DLP fails to meet could be accommodated elsewhere, even if not in full. There is no evidence in the DLP of any engagement having taken place, nor is there anything within the DLP which confirms the outcomes of any engagement. 2.6 There is reference in the Castle Point Borough Council Housing Capacity Topic Paper (August 2025) to discussions having taken place under the Duty to Cooperate with neighbouring authorities. However, no details are provided as to the nature of such discussions,								

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											outcomes, etc. Furthermore, the reference relates only to neighbouring authorities' views obtained July-September 2024 on the Council's Local Housing Needs Assessment, prepared in 2023 – work that needs to be fundamentally reconsidered in light of the 2024 NPPF and revised PPG, and the approach Councils are now required to take in order to address the housing crisis. 2.7 It is clear that significant further work is required by the Council in order for it to be able to demonstrate that it has carried out the Duty to Cooperate positively and proactively.								

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1000-0003	Agent	Sam	Hollingsworth	Rainier Developments c/o Ceres Property	Yes	SP3	No		No		4.1 Policy SP3 is fundamentally unsound. It is unjustified, fails to ensure the DLP is positively prepared, is clearly contrary to national policy, and there are substantial concerns with its effectiveness. The reasons for this are set out below. 4.2 Furthermore, it would appear the Council is itself that its DLP is highly unlikely to be found sound, as evidence by correspondence between it and the Minister of State for Housing and Planning at MHCLG, as discussed within this section. Quantum 4.3 Policy SP3 suggests the DLP will deliver 6,196 homes over the period 2026-2043, which equates to an average of 364 dpa. This is despite acknowledging at paragraph 6.52 that its housing requirement for this period is 11,662 (albeit, seemingly not recognising that this is a minimum) as per the NPPF and the approach to calculating local housing needs set out in the PPG. 4.4 Assuming the DLP were to deliver all the homes it purports to (and there are substantial doubts that it will, as we discuss later within this representation), this will leave a shortfall of		Not Answered	Not Answered	Yes - See attachments	B - update attachments	<u>Housing Supply</u> Suggests conflict with NPPF and PPG <u>Green Belt/Grey Belt</u> The substantial shortfall in housing provision proposed by the DLP is evidently a consequence of its refusal to amend the Borough's Green Belt boundaries. The DLP adopts an overly rigid, almost sacrosanct approach to the Green Belt, which is fundamentally at odds with national planning policy. In contrast, the NPPF makes clear that Green Belt boundaries can be altered through the Local Plan process where justified by exceptional circumstances, such as meeting identified housing needs. Highlights changes to NPPF Green/Grey Belt classification.. <u>Timescales for Delivery</u> In addition to concerns regarding the overall	<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.	See Schedule of Modifications re: flooding

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											5,466 dwellings over the plan period. The DLP is seeking to provide just 53% of what the NPPF expressly requires the DLP to deliver as a minimum. There are no indications that there are robust arrangements in place to ensure that the Borough’s residual local housing need will be met elsewhere within the housing market area. 4.5 The Council’s approach is clearly contrary to the NPPF. Not only that, but contrary to an aspect of the NPPF which the Government makes clear is critical for Local Planning Authorities to address as part of its approach to dealing with the national housing crisis. 4.6 Even if one were to ignore that the DLP’s approach to addressing need is in direct contradiction to the NPPF and PPG, the social and economic harm of failing to meet housing needs is vast, for the reasons we set out in Section 3 of this representation. However, such matters do not appear to have been given due consideration in determining the number of new homes. 4.7 In Section 3 of this representation, we set out our concerns pertaining to Policy SP3 in terms of the						quantum of housing proposed, there are also significant issues with the timing of delivery set out in Policy SP3. Not only will the DLP fail to address local housing needs as per the NPPF, but the strategy will mean the shortage will be particularly acute in the first 10 years of the plan period. <u>Densities</u> The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the Borough, and one that will necessitate flattened development. There is a lack of evidence to substantiate if it is even feasible for a development of this nature could be delivered whilst also providing for a variety of house types as needed and / or meeting the development management		Within the NPPF Paragraph 11 section b (a) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. <u>Housing Supply – 5 Year Supply and Timescales</u> Housing Supply: See housing topic paper. Plan to provide for rolling 5 year housing land supply. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <u>Densities</u> Policy Hou3 indicates the housing mix, including in Premium sustainability areas. <u>Flooding</u> Flood risk covered in policies and the supporting	

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											SA and the SEA Regulations. Plainly, such concerns also go to the soundness of the DLP, particularly insofar as concerns the need for Local Plans to be justified and the important role sustainability appraisal should play in this. It is clear from the SA that the DLP’s purported justification for failing to meet housing needs is based on specious reasoning which fails to properly evaluate the effects of seeking to meet housing needs versus failing to do so, particularly in respect of affordable housing. 4.8 The DLP’s significant shortfall in proposed housing provision when compared to the minimum number required to ensure the DLP is capable of being found sound is evidently a function of the Council’s refusal to make any alterations to the Borough’s Green Belt. The DLP suggests a sacral approach to the Green Belt which is totally at odds with national planning policy. On the contrary, the NPPF makes clear that the preparation of a Local Plan is the appropriate vehicle through which to amend Green Belt boundaries, and that the inability to otherwise meet						standards the DLP proposes. <u>Flood Risk</u> The NPPF is clear that development should be directed away from areas at higher risk of flooding. Given that there are alternative sites within the Borough subject to lower flood risk—which have been rejected—the DLP’s approach in this regard is not justified. The DLP does not appear to be supported by a sequential test that could justify such an approach as the NPPF requires. Even if it could be shown to pass the sequential test, there is a lack of evidence to confirm development would be capable of passing the exceptions test for development in areas of flood risk. To rely so heavily on the delivery of such a development site, fundamental to the DLP’s proposed housing strategy, is	Strategic Flood Risk Assessment (SFRA). <u>Emergency Planning</u> Policy SD8 covers Developments near Hazardous Uses. Development proposals within the consultation zone will be assessed in accordance with the Health and Safety Executive (HSE) Guidance who may advise against development on health and safety grounds. The Council will place great weight on the recommendation provided by the HSE. Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP).	

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											housing needs is justification for makes such changes. 4.9 It is notable that the Council previously prepared a Local Plan in the context of the 2021 NPPF, which included limited release of Green Belt, and sought to deliver 5,510 new homes for the Borough between 2018 and 2032, an average of 367 dpa. This Local Plan was examined and found to be sound subject to main modifications, but ultimately withdrawn by the Council. The withdrawn, but sound, Local Plan ('the wLP')'s approach to making alterations to the Green Belt boundary in order to address housing needs was found to be consistent with the relevant national planning policy at that time, which was less permissive to such an approach than the current national planning policy with which the DLP must accord. 4.10 In terms of changes to the NPPF and PPG since the wLP, three key aspects merit highlighting: the NPPF is now expressly clear that exceptional circumstances which justify alterations to the Green Belt through a Local Plan include, but are not limited to, where an Authority cannot otherwise meet						unjustified and alarming. <u>HSE Hazardous Installations Consultation Zone</u> The proposals appear to focus significant scale development in the HSE Hazardous Installations Consultation Zone. There are two Upper Tier COMAH (Control of Major Accident Hazard) sites located on Canvey Island. It is unclear if the HSE would consider West Canvey an appropriate location to which to direct significant scale housing growth.		

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											housing needs; grey belt – a new category of Green Belt land, which does not contribute strongly to purposes (a), (b) or (d) – should be considered as part of a Green Belt review and prioritised for release ahead of other greenfield Green Belt land; the minimum housing requirement for which the Borough needs to plan has increased substantially, strengthening the case that alterations to the Green Belt are necessary. 4.11 The Council’s Castle Point Green Belt Assessment (July 2025) identifies a number of potential grey belt sites within the Borough. We consider that there are additional grey belt sites this assessment should have identified, as discussed in our Section 6 of this representation. In any case, the key point insofar as concerns Policy SP3 is that there are evidently Green Belt sites that do not strongly contribute to purposes (a), (b) or (d) of the Green Belt and could be utilised to increase housing provision. Even if development of such land would not meet needs in full, it could reduce the shortfall compared to current proposals. 4.12 The Council’s Housing								

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											Capacity Topic Paper 2025 makes reference to Borough’s Green Belt being “heavily constrained...[but] even with potentially unconstrained areas, sustainable accessibility and infrastructure deliverability present significant barrier to development” (page 66). However, the DLP lacks any robust evidence to demonstrate that there are no Green Belt sites subject to such constraints that they cannot sustainably provide homes for the Borough. 4.13 For example, in seeking to justify the DLP’s approach, and in respect of transport and sustainable access, the Council’s Housing Capacity Topic Paper 2025 asserts at paragraph 12.9 that sites on the edge of settlements do not have access to services or public transport provision, and that Green Belt sites promoted would not be developed at a density that would enable public transport services to be sustained. At 12.12 it goes on to conclude: “It is therefore appropriate and in accordance with the NPPF to avoid development in the Green Belt as it would not be sustainably located and would impact on traffic capacity on the local and									

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											strategic highway network. This is consistent with paragraphs 110 and 115 of the NPPF.” 4.14 Even if one were to overlook that edge of settlement sites are not inherently remote from services or public transport opportunities, or that sustainable transport is not limited to public transport, the conclusion fails to consider potential mitigation measures that might be required. In any case, the Council’s own evidence does not support this position adopted by the Housing Capacity Topic Paper – the Green Belt Site Assessment (July 2025) suggests there are Green Belt sites that have been promoted that are capable of being considered suitable from a transport and accessibility perspective and are capable of complying with NPPF paragraphs 110 and 115. 4.15 Separately, we note that the Council wrote to Matt Pennycook, the Minister of State for Housing and Planning at MHCLG on 4 April 2025, setting out concerns in terms of the Council’s ability to address the minimum housing requirement in the preparation of a new Local Plan; and confirming that								

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											the Council considers there is to be significant risk that its proposed approach through the DLP will be found to be unsound when considered against the NPPF. The response from the Minister of State (30 June 2025) made clear that the Council is expected to quickly bring forward a Local Plan that can be found sound. Given this exchange, it is far from clear why the Council has subsequently prepared and published for consultation the DLP in its current form. To proceed to submission and examination of the DLP in its current form would not only engender soundness concerns, but with expectations that the DLP would be found unsound, it would be a highly questionable use of public resources. Timescales for Delivery 4.16 There are concerns with temporal aspects of Policy SP3, in addition to the overall quantum of housing proposed. 4.17 Not only will the DLP fail to address local housing needs as per the NPPF, but the strategy will mean the shortage will be particularly acute in the first 10 years of the plan period. 4.18 Policy SP3 suggests that in the first five years of the plan period (2026-								

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											2031), the DLP will seek to provide for an average of 209 dpa (just 30% of its local housing need); rising to 253 dpa for the period 2031-2036 (37% of its local housing need); and then stepping up significantly, albeit still substantially short of the 686 dpa minimum, to 554 dpa from 2031-2043. 4.19 This temporal aspect of Policy SP3 is particularly problematic for the following three reasons. 4.20 Firstly, there is an urgent local need for housing, , now – the delivery of homes is not a matter than can simply be deferred until a later date. 4.21 Secondly, the PPG is clear that if a housing trajectory is to be stepped, there should be clear justification for doing so and that it must ensure housing needs are met in full in the plan period. In the DLP’s case, neither criterion has been met. 4.22 Thirdly, the LHNA identifies that whilst the affordable housing need for the Borough over the plan period totals 3,976 dwellings, there are an is estimated 3,220 households in the Borough currently living in unsuitable housing and are unable to afford their own housing, i.e. the vast								

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											majority of the community’s affordable housing needs are an immediate need. The DLP failure to plan positively to deliver homes, including affordable housing, in the early part of the plan period will have significant negative social repercussions for the Borough. Deliverability 4.23 Policy SP3 places significant reliance on redevelopment of urban sites on Canvey Island in order to achieve its proposed housing figure of 6,196 homes. 4.24 3,143 new homes are proposed to be delivered in this manner – 51% of the total for the Borough. Of these, 2,000 homes are proposed to be delivered through redevelopment of land at West Canvey (Policy C4). It is not clear if this site is suitable, available or achievable for development. As the DLP itself notes, the land is currently in use as employment sites and retail park, and is well occupied by a mix of uses. 4.25 The DLP suggests the proposed approach will require a density of 150 dph – an extremely high density compared to existing development within the Borough, and one that will necessitate flattened								

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											development. It is far from clear if such development could be delivered whilst also providing for a variety of house types as needed and / or meeting the development management standards the DLP proposes. 4.26 Furthermore, the location is within Flood Zone 3 – land at greatest risk of flooding from tidal or fluvial sources. The NPPF is clear on the need to steer development away from such areas, and given that there are options for development in areas of the Borough that are subject to lesser degrees of flood risk, but which have been rejected, the DLP’s approach is not justified in this regard. The DLP does not appear to be supported by a sequential test that could justify such an approach as the NPPF requires. Even if it could be shown to pass the sequential test, there is a lack of evidence to confirm development would be capable of passing the exceptions test for development in areas of flood risk. 4.27 Additionally, this area has some of the weakest connectivity and access to sustainable forms of transport relative to other parts of the Borough. It is								

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											particularly detached from the Borough's railway station, for example. 4.28 Finally, the proposals appear to focus significant scale development in the HSE Hazardous Installations Consultation Zone. There are two Upper Tier COMAH (Control of Major Accident Hazard) sites located on Canvey Island. It is unclear if the HSE would consider West Canvey an appropriate location to which to direct significant scale housing growth. 4.29 A number of the DLP's allocations, relied upon to deliver a significant proportion of the new homes proposed, lack evidence of deliverability. The DLP may deliver far fewer homes in actuality than it purports to, exacerbating the already substantial shortfall of proposed provision compared with local housing needs.								

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1000-0004	Agent	Sam	Hollingsworth	Rainier Developments c/o Ceres Property	Yes	DH2	No		No		5.1 Policy DH2 seeks to prevent coalescence of Daws Heath, a village located to the east of Thundersley, with neighbouring settlements. 5.2 The policy as proposed is not considered consistent with national policy or justified. Furthermore, it risks undermining potential opportunities to ensure the DLP can be considered positively prepared as defined by the NPPF. 5.3 The policy as currently drafted in the DLP states: Development of undeveloped land and intensification of developed land between Daws Heath, and neighbouring settlements will only be supported 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. 5.4 At paragraph 12.13, the DLP explains that “Although there is Green Belt encircling Daws Heath, it is considered necessary to provide additional protections to prevent urban sprawl and coalescence and maintain the openness of this area”. 5.5 The above suggests that the policy is seeking run directly contrary to the		Not Answered	Not Answered	Yes - See attachments	B - updated attachments	Policy DH2 is seeking run directly contrary to the NPPF and PPG, and the clear instruction through these that Green Belt purpose (b) (to prevent neighbouring towns merging into one another) is only relevant in relation to merging of towns, and expressly confirms it is not relevant in respect of villages. The policy as worded fails to allow decision-makers to take a balanced approach to consideration of the issue. As currently worded, the policy could be interpreted by decision-makers as requiring any proposal for development between Daws Heath and neighbouring settlements (as any development that involves a net increase in development could be said to result in some reduction of openness, even if	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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											NPPF and PPG, and the clear instruction through these that Green Belt purpose (b) (to prevent neighbouring towns merging into one another) is only relevant in relation to merging of towns, and expressly confirms it is not relevant in respect of villages. 5.6 The policy as worded fails to allow decision-makers to take a balanced approach to consideration of the issue. As currently worded, the policy could be interpreted by decision-makers as requiring any proposal for development between Daws Heath and neighbouring settlements (as any development that involves a net increase in development could be said to result in some reduction of openness, even if only nominally) to be resisted, regardless of any benefits associated with the proposal. 5.7 The purported justification as set out in the DLP is that “Engagement through the preparation of the Castle Point Plan has highlighted that residents feel it is vitally important that the unique character of Daws Heath is protected” [12.11] and “Ensuring the gaps between Daws Heath, and other settlements are maintained will protect its						only nominally) to be resisted, regardless of any benefits associated with the proposal. The plan provides nothing to suggest that any development of any land between the village and neighbouring settlements would inevitably harm its character; and appears to be based on the false assumption that new development on the edge of settlement would be intrinsically harmful to the character of the village in question.		

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											unique identity and semi rural character.” [12.14]. Whilst ensuring the protection (or enhancement) of the character of Daws Heath is an appropriate objective, the DLP provides nothing to suggest that any development of any land between the village and neighbouring settlements would inevitably harm its character; and appears to be based on the false assumption that new development on the edge of settlement would be intrinsically harmful to the character of the village in question.								

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1000-0005	Agent	Sam	Hollingsworth	Rainier Developments c/o Ceres Property	Yes	SP3	No		No		6.1 This section of our representation concerns the DLP's site selection process insofar as it concerns site GB14 / (Site ID40101) / Land South of Daws Heath Road, Thundersley ('the Site'). 6.2 It is noted that the DLP fails to allocate any Green Belt land for residential development. The Council's evidence to support such a stance is highly questionable, given that the wLP was only recent examined, through which it was confirmed that the allocation of multiple sites within the Green Belt was a sound approach. Subsequently, and in the context of the DLP, the Borough's minimum housing requirement is significantly greater; and the NPPF and PPG are clear on both the need to amend Green Belt boundaries where housing needs cannot otherwise be met, and on the need to take a more permissive approach to considering the suitability of allocating Green Belt land for development. In this context, the Council's stance set out in the DLP cannot be justified. Sustainability / Suitability 6.3 The Site adjoins the existing residential envelope of a settlement		Not Answered	Not Answered	Yes - See attachments	B - update attachments	Makes case for the inclusion of Site GB14.	Noted	N

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											identified as sustainable to accommodate proportionate growth in the current Development Plan. It adjoins existing residential areas. 6.4 The Site is not subject to any physical, environmental, ecological or heritage constraints that suggest it would be unsuitable for residential development. The Site's only constraint to development is that it is located on land designated as Green Belt in the Development Plan, which dates back to 1998 – a policy constraint, and one shared by the vast majority of land with the potential to contribute to the Borough's needs. 6.5 A planning application made in respect of the Site in 2023 (reference 23/0104/OUT) confirmed the suitability of the Site for residential development in terms of a lack of physical, ecological, environmental, or heritage constraints. Such assessment work was reviewed by the relevant statutory consultees and other stakeholders through the consideration of this application. 6.6 Application 23/0104/OUT was subject to a non-determination appeal ((APP/M1520/W/23/332958								

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											5) which was dismissed on the grounds that the very special circumstances required to justify such development in the Green Belt had not been demonstrated in the case of that specific application. 6.7 The Site's potential suitability, availability and achievability was considered through the Council's Strategic Land Availability Assessment (July 2025) (SLAA). 6.8 The SLAA considered the site in relation to 24 different suitability criteria. In relation to every one of these, the SLAA suggested the site was suitable. Despite this, the SLAA concludes the suitability of the Site for residential development is questionable. The justification for this is far from clear. 6.9 The SLAA also applies a scoring system through which sites are awarded a value relating to each one of the 24 suitability criteria. The Site scored a total of 61 using this approach, out of a maximum score of 82. This score is greater than several sites that are proposed to be allocated for residential development through the DLP, such as Land to the west of Canvey Island (score of 40); and Manor Trading Estate (score								

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											of 58). Whilst it is not considered that the process of determining site allocations can be distilled down to a basic quantitative scoring exercise, these results, the conclusions in respect of the Site’s suitability, and the approach to site selection having regard to this is very questionable. Particularly in the context of a DLP which allocates insufficient land to meet housing needs, and claims it is not possible to meet development needs in full. 6.10 One of the reasons suggested by the Council’s Housing Capacity Topic Paper (2025) as to why the DLP fails to meet the Borough’s minimum housing requirement, is the lack of any Green Belt sites that are capable of being considered suitable from a transport or accessibility perspective, in terms of compliance with NPPF paragraphs 110 and 115. The Topic Paper cites the justification for this stance as follows: “A site level sustainability and accessibility assessment was commissioned to consistently and robustly assess the sustainability of each Green Belt site’s location on the transport network, and to determine								

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											through highway design if the site can be accessed by all users in a safe way, considering national design requirements” [12.6] 6.11 However, this assessment (Green Belt Site Access Assessment (July 2025)) found that GB14 was one of a small number of Green Belt sites that is capable of being delivered in a manner which accords with NPPF paragraphs 110 and 115. This is consistent with the appeal decision in respect of this site, discussed in Section 3 of this representation, in which no concerns vis-à-vis the site’s residential development and transport, accessibility, or highways impacts were found. 6.12 Concerns in terms of how the Site was considered as GB14 through the SA are set out in Section 3 of this representation. They are not repeated here, but are applicable to the soundness of the DLP, as well as relevant to considering compliance with the SEA Regulations. 6.13 The Site is sustainable for residential development, as the appeal decision in respect of APP/M1520/W/23/3329585 confirmed. 6.14 The Site is evidently								

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											suitable for development. Indeed, the Council’s own evidence base effectively concerns this, with the exception of the fact the Site is on land currently designated as Green Belt. This is discussed below. Green Belt 6.15 The last site-specific assessment of the Site’s contribution to the Green Belt purposes by the Council was through the Council’s Green Belt Boundary Review 2013, in which the following was concluded: “The Green Belt could be redefined in this location using existing field boundaries, tree belts and ancient woodland, and existing residential development, all of which are readily recognisable physical features. “There is some concern over the potential narrowing of the western edge of the Daws Heath Ring part of the Green Belt, however it is considered that a form of development could be achieved in this location, which integrates into the existing landscape and pattern of development in this area. “A redefined boundary would still allow for this part of the Green Belt to fulfil its purposes”. 6.16 The relevant extract of								

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											the Council’s Green Belt Review (2013) is provided as Appendix 1. 6.17 Separately, as noted above, an appeal for a proposed residential development of the Site (‘the 2024 Appeal’) was dismissed in 2024, when it was considered that very special circumstances to justify residential development in the Green Belt had not been demonstrated in that instance. 6.18 It is important to recognise that, firstly, as confirmed through the judgment in Compton7 the ‘very special circumstances’ test for permitting inappropriate development in the Green Belt is a higher and more demanding test than the ‘exceptional circumstances’ test applied to altering Green Belt boundaries at the plan-making stage. 6.19 Secondly, in terms of the Site’s contribution to the purposes of the Green Belt, the appeal decision predated the current NPPF and PPG, and their definition of grey belt and methodology for assessing the contribution to the purposes of the Green Belt. 6.20 The NPPF defines grey belt as land in the Green Belt comprising previously								

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											developed land and/or any other land that, in either case, does not strongly contribute to any of Green Belt purposes (a), (b), or (d) in. The definition excludes land where the application of the policies relating to the areas or assets in NPPF footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. 6.21 In relation to purpose (a) (to check the unrestricted sprawl of large built-up areas), Thundersley is a town, and as such constitutes a large built-up area for the purposes of considering the Site's contribution to the Green Belt. 6.22 In the 2024 Appeal decision, the Inspector concluded that: "Woodland would restrict further spread of Thundersley towards Daws Heath. In that sense, the proposal would not lead to totally 'unrestricted' sprawl and the integrity of the wider Green Belt between Thundersley and Daws Heath in serving this purpose would not be wholly undermined by the proposal" ⁸ 6.23 However, the Inspector went on to opine that: "There would be a close physical link between								

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											development on the site and Nos 154-164 and given the proximity, I agree with comments made by the appellants at the Hearing that these bungalows would be ‘tied in’ with Thundersley and would relate in stronger fashion to it. In my view, the proposal would lead to these dwellings being read and appreciated as part of Thundersley in contrast to the existing impression of a standalone group and consequently the further outward expansion of Thundersley beyond the site. As a result, I cannot agree that the site as a whole is very well contained or that sprawl would be limited to the appeal site as the appellants asserted”. 6.24 The 2024 Appeal decision predates updates to the PPG that set out how the various levels of contributions to the Green Belt should be assessed. As such it is appropriate to revisit these conclusions in the context of the PPG. 6.25 The PPG explains that sites making a strong contribution to this purpose are likely to be free of existing development and lack physical features in reasonable proximity that could restrict and contain development. 6.26 In the case of the Site, it adjoins the existing								

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											settlement to its west. To the south and east of the Site, any potential future incursion of development into the Green Belt is prevented by the presence of dense woodland, protected from removal / development by its Ancient Woodland designation. To the north, Daws Heath Road provides a clear boundary of substantial permanence. 6.27 There is nothing within the PPG to support the view that a change in the relationship between the existing bungalows at 154-164 Daws Heath Road could constitute harm to purpose (a) of the Green Belt. On the contrary, the PPG now states that where sites lack physical features that could restrict or contain development, such land might be capable of being found to make a strong contribution. In this instance, the existing dwellings to the south of Daws Heath Road, and riding school buildings, evidently provide physical features which act to contain the Site. Furthermore, to the south and east of this neighbouring development, further woodland areas restrict the possibility for any future encroachment into the Green Belt. 6.28 A Landscape, Visual								

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											and Green Belt Assessment (LVGA) has been prepared which considers a specific proposed development for the Site, including in relation to the current NPPF and PPG on Green Belt. A copy of this LVGA is provided as Appendix 2. The LVGA assessed the Site’s contribution to purpose (a) as weak / none. 6.29 Turning to purpose (b) (to prevent merging towns merging into one another) this was evidently a determinative factor in the dismissal of the 2024 Appeal. Specifically, in relation to the separation of Thundersley and Daws Heath. The Inspector in the 2024 Appeal expressly stated (at paragraph 28) that Daws Heath is a village; but noted that the Council’s Castle Point Borough Green Belt Review – Part 1 (2018) (GBR) considers Daws Heath as a town. 6.30 Subsequently, the PPG has clarified that purpose (b) relates to the merging of towns, and expressly states it is not relevant to villages. 6.31 The 2024 Appeal decision stated that Daws Heath was a village. A subsequent appeal decision ⁹ (451-469 Daws Heath Road) reaffirmed this view, but in this case expressly in relation to the definition of grey belt.								

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											6.32 Consequently, as confirmed in 451-469 Daws Heath Road, purpose (b) of the Green Belt is not relevant to the village of Daws Heath, and thus not relevant to the Site. 6.33 In any case, the PPG now confirms that areas which are likely to make a strong contribution to purpose (b) of the Green Belt are likely to be free of existing development, and form a substantial part of a gap between settlements the development of which would be likely to result in a loss of visual separation of towns. 6.34 As the 2024 Appeal Decision confirmed, the gap between the Site and Daws Heath is not free from existing development; and there would be no intervisibility between the proposed development and the edge of Daws Heath. 6.35 As such, the Site could not be considered to make a strong contribution to Green Belt purpose (b) and prevention of coalescence between Daws Heath and Thundersley. even if the status of Daws Heath as a village was to be (unreasonably) ignored. 6.36 The LVGA assesses the Site's contribution to purpose (b) as weak / none. 6.37 In respect of purpose (d), the 2024 Appeal did not								

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											suggest the Site made any contribution to this. Very few sites do, as few Green Belts perform the role of preserving the setting or special character of any historic town. Thundersley is not an historic town in this context, and thus the Site cannot make any significant contribution to purpose (d). 6.38 The NPPF Annex 2 confirms that the definition of grey belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. These include Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments) and areas at risk of flooding or coastal change. None of these apply to the Site. 6.39 Having regard to all of the above, the Site is considered to meet the definition of grey belt. Availability and Achievability								

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											6.40 The Site is subject to a lack of any significant constraints to residential development, and does not require any significant additional infrastructure to be brought forward ahead of it providing homes. 6.41 An application has been submitted for the residential development of the Site, accompanied by technical assessment work and reports which confirm the suitability of the Site for housing. This further demonstrates the Site’s deliverability. 6.42 It is being actively promoted by an experienced promoter with the agreement of the landowner. There are no ownership of other legal obstacles to the Site’s development for residential use. It is able to accommodate c.58 new homes through a development that would respect its edge of settlement location and the character of the area, and is available and achievable for 50% affordable housing – c.29 affordable homes that would be a significant benefit to the community, particularly in light of the Borough’s acute affordable housing shortage. Overview 6.43 In the context of the								

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											Borough's housing need and inability to meet this without impinging on the current Green Belt, the NPPF makes clear the need to amend Green Belt boundaries. There are evidently suitable, available and achievable sites for residential development which are currently designated as Green Belt in a very out of date Local Plan. The examination of the wLP confirmed that amending the Green Belt boundary to help address development needs was a sound approach, even in the context of national policy which was much less positive on taking such an approach, as well as the Borough's development requirements being much less than exists today. The DLP's refusal to make any alterations to the Green Belt, despite the NPPF's clear exhortation to do so in these circumstances, and the current boundaries being based on a wholly out of date Local Plan, renders the DLP manifestly unsound. 6.44 The Site is sustainable and deliverable for residential development. 6.45 It is grey belt land that should be prioritised for allocation through the new Local Plan. 6.46 A relatively recent								

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											appeal decision confirmed a lack of any constraints to the development of the Site, with the exception of national Green Belt policy as it then was. This was of course through the development management process, and a more permissive approach should be taken when considering the potential allocation of Green Belt land through the plan-making process. Furthermore, the NPPF and PPG have been amended in terms of how the appraisal of Green Belt for allocation for development should be considered, which results in a very different conclusion when considering the Site’s contribution to the purposes of the Green Belt than that reached in respect of the appeal. This stance is supported by a LVGA which accompanies this representation, and which concludes the Site is grey belt as defined by the NPPF and PPG. 6.47 The failure of the DLP to allocate the Site should be seen alongside its failure to ensure housing needs will be met, and the acute shortage – particular of affordable homes – the DLP as currently drafted would engender. 6.48 The rejection of the Site in this context means								

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											the DLP is patently unsound – it is contrary to the NPPF, contributes to the Local Plan’s failure to be positively prepared, and its approach is not justified.								

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1000-0006	Agent	Sam	Hollingsworth	Rainier Developments c/o Ceres Property	Yes	Conclusion	No		No		7.1 The DLP in its current form is evidently unsound. 7.2 Its approach to addressing housing need is contrary to the NPPF, and how national policy requires Councils to plan to meet their local requirements. Neither the proposed approach to meeting housing needs, nor the process of considering options in relation to the issue, appear to have given due consideration to the acute and current affordable housing shortage in the Borough. 7.3 The DLP's failings in this regard are rendered even more problematic by its proposal to delay delivering homes until towards the end of the plan period, with the proposed shortfall in the early years particularly pronounced. The negative social effects of putting off the provision of homes exacerbated by this delay, given that the vast majority of the Borough's projected affordable housing need is one that currently exists, would be very significant. 7.4 Not only is the approach to meeting housing needs fundamentally flawed in quantitative terms, but the spatial approach is considered neither justified nor consistent with national policy. 7.5 The bulk of the new		Not Answered	Not Answered	Yes - See attachments	B - update attachments	Considers the plan is unsound. Not meeting housing needs Release Green Belt sites Concern over the SA	Comments noted. These matters have been addressed specifically in each of the policy specific comments	N

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											dwelling s proposed are being directed to an area subject to significant constraints and potentially one of the least sustainable parts of the Borough. Indeed, the deliverability of sites proposed to accommodate a significant proportion of the total number of new homes the DLP's proposes appears highly suspect, particularly at the densities on which the DLP relies. The approach is neither sustainable nor effective. 7.6 Additionally, the site selection process is unsound. 7.7 There are sites that are sustainable and deliverable to provide new homes in the early years of the plan period, but which have been unduly rejected. This appears to have been the result of a combination of a misapplication of the NPPF's Green Belt policies, and a failure to properly consider available evidence (including through the SA) of sites' suitability to accommodate development. This has included the failure to properly identify grey belt land, including deliverable grey belt sites; or to consider non-grey belt, Green Belt land, if insufficient alternatives to meet development needs								

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											are available. 7.8 The SA of the DLP, should be a useful tool to help ensure that the DLP is justified and will achieve sustainable development. However, there are substantial flaws in the SA of the DLP. These include failure to properly consider various effects (in particular social effects), failure to consider options on an evidential and objective basis, and a process that appears heavily and unjustifiably skewed towards favouring options which limit development. 7.9 .Not only are such defects in the SA a soundness matter, but the DLP’s compliance with the SEA Regulations is also of concern, given the extent and nature of the issues with the SA. 7.10 Separately, it is far from clear from the evidence available whether the preparation of the DLP has met the Duty to Cooperate. There is certainly little evidence that work undertaken to meet the Duty to Cooperate have been effective. Most notably, there is a lack of evidence that the Council has had any meaningful engagement with other Authorities within the housing market area regarding the potential for								

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											these neighbours to address the DLP’s shortfall in housing provision. 7.11 Our representations on a Local Plan at this stage would usually seek to suggest remedies for the defects they identify. However, such is the extent and nature of the flaws with the DLP, we suggest that it will be very challenging for the Council to address these without fundamental changes. We suspect it will be necessary for the Council to revisit earlier stages in the plan-making process, and prepare a new Regulation 18 iteration of its Local Plan – one which properly considers options which are genuinely capable of forming a sound Local Plan that complies with national policy; and which is supported by robust evidence, including an SA which meets the requirements of the SEA Regulations.								
0913-0001	Individual	Marilyn	Smale	RESIDENT	Yes	HAD4	Yes		Yes	Consistent with national policy		Traffic in Scrub Lane is increasing and between 7.30am to 9.00am and 4pm to 6pm is heavy leading to congestion and tail backs approaching Rectory Road. Scrub Lane is now used as a cut through to avoid the A13 through Hadleigh. The addition of 114 New Homes on this site will lead to more traffic congestion and residents parking in	No	Not Answered	Not Answered		Objecting to Had4 due to: Traffic capacity on Scrub Lane Parking capacity on Scrub Lane	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	N

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												Scrub Lane will further restrict the flow of traffic.						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.	

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0946-0001	Individual	WILLIAM	Blissett	RESIDENT	Yes	SP3	No	Failing to adequately consider alternative sites across the Borough including North West Thundersley /Blinking Owl site. There is no credible 5year housing land supply. Failure in 'Duty to cooperate' with other Authorities including Essex County Council and Anglian Water.	No	Positively prepared, Effective, Justified, Consistent with national policy	The draft Local plan is not consistent with National Policy. It does not meet the housing targets for Castle Point. Development should be directed away from areas of highest flood risk. Canvey Island has the highest flood risk rating in the Borough and yet has been allocated the largest number of houses of all the Borough areas. The surface and foul water drainage systems on Canvey Island have reached capacity and will not cope with so many additional homes . By building so many new homes the natural drainage on the Island is significantly reduced. The Castle Point draft Plan will be detrimental to the Health and Wellbeing of Island residents. The road network on the Island is at capacity and would not cope with so many additional vehicles. Proper consultation with the businesses on Charfleets has not taken place. The type of businesses do not lend themselves to having flats above them. Such a large	The North West Thundersley / Blinking Owl site should be included in the plan. This is an ideal site for the development of a whole new village with all of the required infrastructure. The Urban Housing target for Canvey Island and the Borough should be reduced with consideration given to development on greybelt and appropriate greenbelt sites. Potential dwellings on Charfleets Industrial Estate should be removed.	No	Not Answered	Not Answered	A	North West Thundersley No five year housing land supply No Duty to cooperate Not meeting housing targets Flood Risk on Canvey Green/Grey belt Concerned about the impact of C4 on residents and businesses.	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. No five year housing land supply The Council is currently relying on the 1998 Adopted Local Plan which does not have up to	N

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											scale redevelopment of the Estate is not practical and would drive many businesses into bankruptcy These businesses would not be able to afford future higher rents.. Many of the businesses own their sites so in some instances compulsory purchase would be necessary.							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 common for stepped increases in housing delivery to be set out and agreed in plans, as stepped	

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																		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. Duty to Cooperate Addressed in the Duty to Cooperate Statement and	

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																		supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. 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	

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																		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 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. Flood Risk on Canvey Whilst Canvey is at risk of flooding, it is not functional flood plain as it is substantially defended from	

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																		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 undertaken a Green Belt Review in accordance with	

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																		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 Castle Point, Evidence of the impact of the Green Belt sites	

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																		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. C4 concerns on residents and businesses This states at paragraph 8.36 There are a mix of uses within the industrial estate including	

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																		offices, gyms, nurseries, car sales and also heavier industry such as steel manufacturing. It is therefore important that the Master Plan for the area sets out a land use strategy that encourages renewal and regeneration but avoids issues of residential amenity and addresses the agent of change principle for noisy businesses already in the area. This will ensure that residential amenity is safeguarded. In terms of businesses the policy proposed does not seek to cause any harm to existing economic activity and seeks to provide a better environment for existing businesses.	

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0283-0001	Organisation	Emma	Goodings	Rochford District Council	Not Stated	SP3	No	Rochford District Council (RDC) 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 National Planning Policy Framework (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.” For Castle Point, the standard method identifies a requirement for the delivery of 11,662 new dwellings over the proposed Local Plan period (2026 to 2043). However, Policy SP3 includes a housing strategy that delivers a minimum of 6,196 new dwellings over the local plan period, resulting in a significant shortfall. In previous consultation responses, RDC raised concerns over strategy options that would not meet Castle Point’s housing need requirement in full and strongly advised CPBC to pursue a strategy that would meet the standard methodology	No	Positively Prepared, Justified, Consistent with National Policy	Positively Prepared: RDC does not consider the CPLP to be positively prepared, as required by paragraph 36(a) of the NPPF. The CPLP fails to set out a clear and deliverable housing strategy for meeting the Borough’s standard method housing need requirement in full. The plan does not demonstrate that all reasonable alternatives have been considered, including those that would meet the full housing need. The evidence-base provides limited justification for the dismissal of spatial strategy options that might have enabled the Borough to meet its full housing need. Furthermore, the CPLP does not provide an agreed approach with neighbouring authorities under the Duty to Co-operate through which the Borough’s unmet housing need could be addressed. RDC reiterates that it is not able to take on any unmet housing need from Castle Point, and no evidence has been presented to suggest that such redistribution has been agreed or is deliverable. Justified: RDC does not consider the CPLP to be justified as required by paragraph 36(b) of the NPPF. The plan lacks a full and transparent assessment of alternative	RDC does not consider the CPLP to be legally compliant and/or sound primarily due to the failure of the CPLP to set out a clear and deliverable housing strategy that meets the Borough’s housing need in full, as calculated using the standard method in line with paragraph 62 of the NPPF. Whilst RDC acknowledges that Castle Point faces notable physical and environmental constraints, the technical evidence-base provides limited justification for the dismissal of alternative spatial strategy options that might have enabled the Borough to meet its housing need in full. There is insufficient evidence that all reasonable alternatives—including those that would meet the full housing need—have been robustly assessed and justified. To ensure the CPLP is legally compliant and sound, further evaluation and testing through the technical evidence-base should be undertaken to ensure that the housing strategy is both justifiable and deliverable. For example, the transport assessment should be used to assess the cumulative impact of growth at the standard method housing need requirement on the local and strategic transport	Not Stated		No	A	Considers that the local plan is not compliant or sound as the housing strategy does not meet all of the housing need calculated by the standard methodology but recognises that CP has significant environmental and physical constraints to meeting its housing need. RDC raised concerns about CP housing strategy approach in previous responses. Does not support policy as does not meet the identified standard method housing need requirement in full. Limited justification to support shortfall and dismissal of alternative spatial options. Asserts that no agreement exists with neighbouring authorities to assist with un-met housing need. No concerns over sites allocated some comments raised for Thun2	CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which 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	N

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								requirements. RDC acknowledges that Castle Point faces notable physical and environmental constraints, including a substantial proportion of land designated as Green Belt (55.9%) and a significant proportion falling within Flood Risk Zone 3 (~50%). However, RDC's objection is not solely based on the failure to meet housing need, but also on the lack of robust and transparent evidence to justify this shortfall. The CPLP evidence-base offers limited technical justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its housing need in full. There is no clear demonstration that all reasonable alternatives, including those that would meet the full housing need, have been adequately assessed and tested. Furthermore, RDC wishes to make clear that it is not in a position to accommodate any unmet housing need arising from Castle Point. As such, the CPLP is deemed not to be legally compliant. Approach to Housing Policy SP3: As outlined			spatial strategy options, including those that would meet the full housing need, and does not provide sufficient evidence to justify the chosen approach. Additionally, the CPLP does not demonstrate how unmet housing need would be addressed through cooperation with neighbouring authorities, and RDC confirms that it cannot accommodate any such unmet need. Consistent with National Policy: RDC does not consider the CPLP to be consistent with national policy, as required by paragraph 36(d) of the NPPF. The CPLP fails to set out a clear and deliverable housing strategy for meeting the Borough's standard method housing need requirement in full. The absence of a justified strategy for addressing unmet need through cooperation further undermines consistency with national policy.	network. This would allow for a more informed understanding of infrastructure requirements and can be used to justify the scale and distribution of growth considered sustainable, acceptable and deliverable for the Borough. In addition, the CPLP must clearly demonstrate how the Borough intends to meet its housing need in full, or provide robust evidence of agreed arrangements with neighbouring authorities. RDC confirms that it is not able to accommodate any unmet housing need from Castle Point, and no such agreement currently exists.					Rochford states it cannot meet any of CP unmet housing need. States that CP has not provided an agreed approach via the DtC with neighbouring authorities on how its unmet housing need could be addressed RDC considers there is a lack of technical justification and robust evidence to support the shortfall in housing delivery particularly with regards the assessment of reasonable alternatives of sites located within the Green Belt. Suggests technical evidence could include further transport assessment on the cumulative impact of growth across South Essex	Essex LNRS and strategic opportunity areas for biodiversity improvements. Castle Point's approach to the site review is outlined within The Housing Capacity Topic Paper August 2023. 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	

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								above, RDC is not supportive of the CPLP housing strategy, as it does not commit to meeting the Borough's identified standard method housing need requirement in full within the CPBC administrative boundary. Limited information is provided regarding the justification for the dismissal of alternative spatial strategy options that might have enabled CPBC to meet its full housing need. Furthermore, no approach is outlined for addressing the resulting unmet need, and no agreement exists with neighbouring authorities to accommodate it. RDC therefore finds Policy SP3 to be neither legally compliant nor sound.										considers based on the evidence that this is a realistic housing delivery. CPBC notes that BBC is unable to assist CPBC in meeting its unmet housing need. CPBC has followed the EPOA protocol for considering unmet housing need and has requested assistance from all its neighbouring authorities to help with meeting its unmet housing need. No authority was able to assist. CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well	

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																		as its market capacity. This has been rigorously evidenced through the Green Belt Assessment July 2025 which 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. Castle Point's approach to the site review is outlined in The Housing Capacity Topic Paper August	

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																		2025. 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. CPBC notes that RDC is unable to assist CPBC in meeting its unmet housing need. CPBC has followed the	

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																		EPOA protocol for considering unmet housing need and has requested assistance from all its neighbouring authorities. No authority was able to assist.	
028 3-000 2	Organisation	Emma	Goodings	Rochford District Council	Not Stated	For word	Yes	Rochford District Council (RDC) has no specific concerns to raise over Castle Point Borough Council's (CPBC) legal compliance with respect to the Duty to Co-operate. RDC notes that while officer-level engagement has taken place through South Essex Councils (SEC) and Essex Planning Officers Association (EPOA), there	Yes			In line with Paragraph 28 of the NPPF, RDC requests the agreement of a Statement of Common Ground with CPBC to evidence areas of agreement in support of the submission of the Plan for examination. RDC also wishes to make clear that it is not in a position to accommodate any unmet housing need arising from Castle Point, and no	Not Stated		No	A	States that there are no Duty to Cooperate concerns with CP. Good working relationship at officer level but queries member DtC with reference to the local plan. Requests a Statement of	All South Essex members including CPBC members meet their Duty to Cooperate through SEC and EPOA and will continue to collaborate on strategic matters through these bodies.	N

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								has been limited member-level involvement regarding Castle Point's Local Plan. RDC encourages greater member engagement through SEC to support strategic alignment and transparency. The Council would, however, like to emphasise the importance of ongoing and meaningful collaboration between local authorities in addressing all identified strategic priorities, particularly in relation to infrastructure. CPBC is therefore encouraged to continue to positively and constructively engage with RDC on strategic cross-boundary matters, especially as the emerging Rochford Local Plan progresses.				agreement currently exists to do so.					Common Ground to be put in place.	CPBC to draw up a Statement of Common Ground	
0283-0003	Organisation	Emma	Goodings	Rochford District Council	Not Stated	Thun2	Yes	RDC does not, however, have specific concerns to raise over the soundness of the sites proposed for allocation in this strategy, other than the detailed comments separately provided for Policy Thun2. Policy Thun2: RDC 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. RDC has no specific concerns over the soundness of this policy but	Yes				Not Stated		No	A	No concerns over soundness of policy. Raises issue of impact on infrastructure and loss of school and recreational facilities for policy THUN 2 and recommends this site is carefully master planned and for RDC to be involved in these discussions.	Noted and CP will collaborate with RDC on the masterplan for Thun2	N

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								would like to emphasise the importance of ensuring that the delivery of this site does not place an undue burden on cross-boundary infrastructure and is adequately supported by local infrastructure improvement. 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. RDC 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.											
0283-0004	Organisat ion	Em ma	Goo ding s	Roch ford Distri ct Coun cil	Not State d	Hou 6	Yes	Policy Hou6: The Council supports CPBC’s approach to meeting identified needs for additional Gypsy and Traveller accommodation. RDC would like to emphasise the need for continued close and effective working on Gypsy and Traveller accommodation across Essex, through the EPOA and other strategic planning groups. Furthermore, it is important for CPBC to continue to engage with the ongoing EPOA programme	Ye s				No t Sta ted		No	A	Supports CP’s policies on Gypsy and Traveler Sites. Refers to need to work across South Essex to identify a transit site.	Noted agreed	N

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								of work to identify the need for a transit site within Essex, with any outcomes of this work factored into reviews of the CPLP.											
0283-0005	Organisation	Emma	Goodings	Rochford District Council	Not Stated	E1	Yes	Policy E1 and E2: RDC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites (including at SEL2: Stadium Way, Rayleigh Weir) may provide opportunities to broaden and diversity the local economy and provide employment opportunities for residents of a wider area, including Rochford District, both directly and indirectly through supplementing wider supply chains. Approach to Town Centre and Retail	Yes				Not Stated		No	A	Supports CP plan's economic policies Policy	Noted	N
0989-0001	Individual	Dylis	Chisholm		Yes	Whole Plan	No		No			This is legal jargon to confuse the residents of Castle Point. Everyone I speak to about extra houses being built says how can we sustain the massive amount of traffic on our narrow roads, the doctors surgeries will not be able to cope and new schools will have to be built. This pleasant area where we live will be spoilt. I look at the congestion on the main roads and realise this	No	Not Answered	Not Answered		Traffic Infrastructure	Transport The plan has been subject to detailed Transport Assessment, assessing impacts and recommending local interventions. These are identified in the Infrastructure	N

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												not viable for future healthy living.						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 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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0990-0001	Individual	Richard	Bates		Yes	HAD4	Yes		No	Justified	There is no justification for such an obscene number of properties being built on this small piece of land - even more so given previous failed attempts to push through similar projects in the past for far fewer homes. The impact this will have in terms of traffic locally and cars being parked on neighbouring streets is a huge concern in its own right. The environmental impact of this being built next to Hadleigh Infants and Nursery School with the playground so close by is also a major issue - particularly given the length of time this project would take to complete. This land should return to its initial state as a playing field or be considered as an opportunity to create further sport and recreation facilities as part of the Castle Point Playing Pitch Strategy. Local children attending Hadleigh Junior School and Hadleigh Infants and Nursery School would benefit hugely from the facility as well as residents, community groups and sports teams. Hadleigh has the potential to be considered a real leader, not just in terms of the Borough but County-wide, for local sport and recreation facilities and is		No	Not Answered	Not Answered		Objecting to HAD4: Traffic Impact of development on the school Engage with sport england to restore to playing pitch	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. Development disruption Impact of any works will be mitigated by a construction environment management plan in accordance with policy SD6 to ensure that disruption is sufficiently mitigated. Loss of Playing Pitch Policy HAD4 includes mitigation for the loss of the playing field.	N

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											passing up a huge opportunity. Why not consult Sport England or Fields in Trust on how we can transform this site and think about the longer-term benefits this would have for local residents, businesses and the community as a whole?								
028 3-000 6	Organisation	Emma	Goodings	Rochford District Council	Not Stated	E2	Yes	Policy E1 and E2: RDC is broadly supportive of these policies and the CPLP's overall economic strategy. It is acknowledged that the provision of new employment land in and around town centres, and the safeguarding of economy use at existing sites (including at SEL2: Stadium Way, Rayleigh Weir) may provide opportunities to broaden and diversity the local economy and provide employment opportunities for residents of a wider area, including Rochford District, both directly and indirectly through supplementing wider supply chains.	Yes				Not Stated		No	A	Supports CP's economic policies Notes safeguarding sites such as SEL2: Stadium Way, Rayleigh Weir and new provision offers employment opportunities to wider area including Rochford.	Noted Noted	N
028 3-000 7	Organisation	Emma	Goodings	Rochford District Council	Not Stated	TC1	Yes	Policies TC1 to TC5: RDC has no specific concerns over the soundness of these policies.	Yes				Not Stated		No	A	Supports Policy on Town Centres and Retail Areas Supports Policy on Hot Food Takeaways	Noted	N
028 3-000 8	Organisation	Emma	Goodings	Rochford District	Not Stated	ENV 1	Yes	Approach to Environment, Biodiversity and Landscape Policy ENV1: RDC has no specific concerns over the					Not Stated		No	A	Supports Policy. Raises query re inclusion of Kingley Wood (an area of	Noted mapping anomaly amended	N

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				Council				soundness of this policy, or the wider environmental strategy. RDC however requests for further clarification regarding the inclusion of Kingley Wood (an area of ancient woodland within the Rochford District administrative boundary) in CPLP interactive mapping.									ancient woodland within the Rochford District administrative boundary) in CPLP interactive mapping.		
0283-0009	Organisation	Emma	Goodings	Rochford District Council	Not Stated	SP4	Yes	Approach to Social Infrastructure and Community Facilities Policy SP4: RDC has no specific concerns over the soundness of this policy, or the wider infrastructure delivery strategy. RDC would, however, like to emphasise the importance of ensuring that the impacts of growth on key cross-boundary infrastructure including, schools, open spaces and healthcare services. This will require continued commitments to collaborative working, including through positive engagement between the Councils as a part of SEC and the EPOA.	Yes				Not Stated		No	A	Supports Policy. Refers to importance to collaborate to accommodate cross-boundary growth on shared infrastructure including schools, open space and healthcare	CPBC concurs that continued collaborative positive engagement between Councils as part of SEC and EPOA is important to successful plan-making of infrastructure to support growth.	N
0283-0010	Organisation	Emma	Goodings	Rochford District Council	Not Stated	T1/T2	Yes	Approach to Highways, Transport and Infrastructure Policy TP1 and TP2: RDC is broadly supportive of these policies and the wider transport strategy proposed. RDC however, would like to highlight the need to keep under consideration the impacts	Yes				Not Stated		No	A	Supports Policy. Highlights need for continued cross-boundary collaboration to consider the cumulative growth impacts on A127 (including at the Fairglens Interchange), A130,	CPBC will continue to work in collaboration with all Essex authorities to consider the cumulative growth impacts on the transport network in South Essex.	N

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								of growth on shared infrastructure, such as on the A127 (including at the Fairglen Interchange), A130, A129 and A13. It is critical that the impacts of growth on the highway network are carefully considered and mitigated. In particular, RDC considers the adequate mitigation of the impacts of growth on the A127 and A129 to be paramount to achieving sustainable development in South Essex. The Council would welcome continued future cross-boundary engagement regarding shared highways and transportation matters and request that information regarding proposed infrastructure improvement plans are shared with officers prior to works being agreed.									A129 and A13 and that adequate mitigation in place. Supports Policy. Highlights need for continued cross-boundary collaboration to consider the cumulative growth impacts on A127 (including at the Fairglen Interchange), A130, A129 and A13 and that adequate mitigation in place.	CPBC will continue to work collaboratively with all Essex authorities to consider the cumulative growth impacts on the transport network in South Essex.	
0283-0011	Organisation	Emma	Goodings	Rochford District Council	Not Stated	T3 / T4	Yes	Policy TP3 and RP4: RDC is broadly supportive of these policies and the wider commitment to enhance active travel and public transport infrastructure. RDC would, however, like to emphasise the importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated. RDC advocates for the delivery of cycling and walking routes which strengthen connectivity	Yes				Not Stated		No	A	Supports Policy. emphasises importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated. Advocates for the delivery of cycling and walking routes between Rochford, Castle Point and Southend.	The Castle Point Local Walking and Cycling Infrastructure Plan 2025 has identified cycling routes between Castle Point Rochford and Southend. CPBC welcomes collaboration with RDC and SCC to bring these routes forward.	N

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								between Rochford, Castle Point and Southend.									Supports Policy. emphasises importance of ensuring the impacts of growth on sustainable transport networks are carefully considered and mitigated. Advocates for the delivery of cycling and walking routes between Rochford, Castle Point and Southend.	CPBC agrees to collaborate with RDC and the other South Essex Authorities to ensure that necessary public transport improvements are in place to support growth.	
0993-0001	Individual	Satinder	Juttla		Yes	SP3	No	The document illustrates the positives of building in the area and fails to highlight the current residence who currently suffer from various fails from GP surgeries to non stop heavy buildup of traffic.	No	Positively prepared, Effective, Justified, Consistent with national policy	This area is already too busy and adding more houses is going to cause further problems for both current and new occupiers.		No	Not Answered	Not Answered		Infrastructure concerns	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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0947-0001	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Positively prepared, Justified, Consistent with national policy	Paragraphs 11a) and b) of the NPPF are clear that all local plans should promote a sustainable pattern of development that seeks to meet, as a minimum, the objectively assessed needs of local planning authority, in addition to aligning growth and infrastructure. Furthermore, paragraph 61 of the NPPF emphasises the Government's objective of significantly boosting the supply of homes by aiming to meet an area's identified housing need. The NPPF therefore leaves local planning authorities in no doubt that it is expected that objectively assessed needs will be met in full. Policy SP3 outlines an intention to provide for 6,196 new homes over the period 2026 – 2043 (equivalent to 365 dwellings per annum. This is just 53% of the local housing need calculated using the government's standard method. , which is 686 dwellings per annum, or 11,662 dwellings over the same period. The NPPF is clear that "strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."	To be positively prepared, the Castle Point plan should, as a minimum, be planning to meet its objectively assessed housing needs. There is an acute need for new market and affordable homes across the borough.	Yes	Not Answered	Yes	A	Concerns over SA. Concerns over Duty to Cooperate.	Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. All reasonable sites and options were considered in the SA.	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC’s correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC’s need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC’s view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-			Referring to the Planning Practice Guidance (PPG), paragraph 3 states, “The standard method should be used to assess housing needs. However it is recognised that there are some specific circumstances in which an alternative approach could be justified, for example as explained at paragraph 14 below.” Paragraph 14 refers specifically to circumstances in which strategic policy-making authority boundaries do not align with local planning authority boundaries, which is not applicable to CPBC. Furthermore, paragraph 15 considers how alternative methods will be tested at examination. The PPG states, “...in the specific circumstances where an alternative approach could be justified, such as those explained at paragraph 014, consideration will be given to whether it provides the basis for a plan that is positively prepared, taking into account the information available on existing levels of housing stock and housing affordability.” The supporting text to the policy (paragraph 6.53) notes, “the suite of evidence gathered in									

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer’s report to Special Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified			preparation of the Plan has shown that achieving that 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 protecting and enhancing the natural environment set out in policy SP1, by impacting on protected areas and frustrating a landscape scale approach to green infrastructure and nature recovery.” The NPPF is clear that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Paragraph 146 of the NPPF stipulates, “Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes...through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally									

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.			undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.” Furthermore, paragraph 148 of the NPPF stipulates that, “Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” CPBC undertook a part 1 assessment of its Green Belt in 2018, with a further assessment prepared for the Castle Point Plan in July 2025. The Green Belt Assessment (July 2025) should, following consideration of Green Belt sites and whether any of those (or reduced areas within them) meet the definition of grey belt, have been followed by further consideration by CPBC of those sites as reasonable alternatives for allocation to assist in meeting the objectively assessed needs of the area. As highlighted further in these representations, CODE does not consider any such consideration has been undertaken by CPBC, which is a fundamental failing of the evidence base which								

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											demonstrates the plan is not justified, or positively prepared. In addition, CODE notes the letter received by CPBC from Matthew Pennycook MP, the Minister of State for Housing, Communities and Local Government, on 30 June 2025, further to a letter sent by CPBC on 4 April 2025 in which it highlighted concerns regarding its ability to meet the housing needs identified by the standard method. However, in the MP's response, it is stated, "I note the concerns you raise in your letter. However, I must tell you in all candour that Castle Point is not unique in facing challenges in bringing forward a local plan that meets the needs of the community... It is perfectly clear that Castle Point officers are capable of delivering a sound plan for councillors, having done so in 2022. Unfortunately, due to previous decisions to not adopt the sound plan, the authority finds itself with one of the worst plan making track records in the country and one of the oldest local plans. This puts the Council in the bottom 2% of the country. Having received substantial								

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											support, it is now your responsibility to make the decisions needed to deliver an ambitious local plan to unlock growth and secure the housing, jobs and infrastructure that Castle Point so desperately needs.” The housing minister finally confirms his expectation that CPBC brings forward a plan that is capable of being found sound quickly. At the time of writing, the Castle Point Plan’s approach to meeting defined housing needs is not sound. There is no justification for the alternative approach advanced by CPBC. An ambitious plan which seeks to meet defined housing needs across a portfolio of sites both on brownfield and greenfield (and thereby Green Belt) can appropriately plan for associated infrastructure improvements to facilitate the level of growth across the borough, as has been proven by the previous Local Plan found sound in 2022. The brownfield led approach will similarly fail to meet anticipated affordable housing needs. There has been a significant decrease in affordable housing being delivered in the borough (against an								

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											already abysmal record) since the introduction of CPBC’s CIL Charging Schedule (adopted 1 May 2023). The enclosed appendix demonstrates several sites where viability assessments have been used to revise levels of affordable housing to be provided (viability assessments have been used to justify no provision of affordable housing on brownfield sites). To be positively prepared, the Castle Point plan should, as a minimum, be planning to meet its objectively assessed housing needs. There is an acute need for new market and affordable homes across the borough. Whilst there are constraints identified in the borough (and on some Green Belt land), the constraints are not ‘strong’ reasons for restricting the overall scale and distribution of development in the plan area (as prescribed by paragraph 11(b) of the NPPF).									

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0947-0002	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	DTC	No	In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, "In order to demonstrate effective	No	Positively prepared, Justified, Consistent with national policy			Yes	Not Answered	Yes	A	Lack of evidence 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

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								and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer’s report to Special Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can												

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								only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and												

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								cannot be applied retrospectively.											

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0947-0003	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	GB2	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Consistent with national policy	Policy GB2 concerns previously developed land in the Green Belt only. Paragraph 17.10 of the supporting text for the policy notes the introduction of Grey Belt policy following the revision to the NPPF in December 2024. At 17.11 of the supporting text notes, "This definition in effect changes how Green Belt is defined. Appendix K sets out the Council's interpretation of key terms within the definition of previously developed land." The policy is inconsistent with the provisions of the NPPF, as it only considers development which comes forward on previously developed land in the Green Belt to 'not constitute inappropriate development.' The NPPF's Grey Belt policy does not exclude greenfield sites from meeting the definition of Grey Belt; for the purposes of plan-making and decision-taking, Grey Belt is defined as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to purposes a), b) and d) of the Green Belt.	The policy is inconsistent with national planning policy and should be updated to reflect that residential development in the Green Belt which meets the definition of Grey Belt (and the golden rules) should not be viewed as inappropriate development.	Yes	Not Answered	Yes	A	<u>SA of GB13</u> Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). <u>Duty to Cooperate</u>	<u>SA of GB13</u> Site GB13 was assessed in the SA. <u>Duty to Cooperate</u> Duty to Cooperate: Addressed in the Duty to Cooperate Statement and supporting Statements of Common Ground. <u>Green Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. Where the 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	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these." The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-			The wording of the policy is particularly concerning for sites which have been identified to meet the definition of Grey Belt within the evidence base supporting the Castle Point Plan, such as land east of Rayleigh Road, Thundersley (site reference GB13a), which is identified within the Green Belt Assessment for Castle Point Borough Council (July 2025) as potentially meeting the definition of Grey Belt. If Rosconn Group were to bring forward a planning application on the site which meets the definition of Grey Belt, in accordance with paragraph 155 of the NPPF (and, additionally the golden rules outlined in paragraphs 156 and 157) the scheme would not be able to comply with policy GB2 (and, by association, policy GB1 – Development affecting the Green Belt). The policy is therefore inconsistent with national planning policy and should be updated to reflect that residential development in the Green Belt which meets the definition of Grey Belt (and the golden rules) should not be viewed as inappropriate development.						<u>and Statements of Common Ground</u> The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which	reasons set out above.	

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council (for the meeting on 23 July 2025) that "The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need." However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified												(in CPBC's view) excludes Green Belt sites from consideration for allocation. <u>Policy GB2</u> The policy is inconsistent with the provisions of the NPPF, as it only considers development which comes forward on previously developed land in the Green Belt to 'not constitute inappropriate development.' The NPPF's Grey Belt policy does not exclude greenfield sites from meeting the definition of Grey Belt; for the purposes of plan-making and decision-taking, Grey Belt is defined as land in the Green Belt comprising previously developed land and/or any other land that does not strongly contribute to purposes a), b) and d) of the Green Belt. The wording of the policy is particularly		

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.									concerning for sites which have been identified to meet the definition of Grey Belt within the evidence base supporting the Castle Point Plan, such as land east of Rayleigh Road, Thundersley (site reference GB13a), which is identified within the Green Belt Assessment for Castle Point Borough Council (July 2025) as potentially meeting the definition of Grey Belt.		

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0947-0004	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	DH1	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Effective, Justified, Consistent with national policy	In relation to policy DH1, CODE would question the need for the policy in addition to the Green Belt designation around Daws Heath itself. In addition, policy ENV1 (protecting and enhancing the landscape and landscape features) performs a similar function. CPBC should consider deleting the policy – three interlinking policies can create difficulty for applicants in navigating local planning policy context which would reduce the likelihood of proposals being found in accordance with the development plan.	DH1 - CPBC should consider deleting the policy – three interlinking policies can create difficulty for applicants in navigating local planning policy context which would reduce the likelihood of proposals being found in accordance with the development plan.	Yes	Not Answered	Yes	A	Questioning why DH1 is needed when the land is allocated as Green Belt and ENV1 performs a similar function, should be removed	Policy DH1 is considered necessary to improve the existing situation with regards to the recreational role of the area which will be protected and enhanced with opportunities for managed passive recreation, focussing on heath, wellbeing and educational value. Projects improving managed walking and cycling connections across the wider area will also be supported. It is important to acknowledge the value to the environment of the land and does not conflict with ENV1.	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC’s correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC’s need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC’s view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-													

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council (for the meeting on 23 July 2025) that "The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need." However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified														

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.											
0995-0001	Individual	mic hell e	bald win		Yes	SP3	No	canvey island is a flood risk area and they are proposing to build 3000+ houses, there is not enough infrastructure for the people who live there with the need for a third road being necessary	No	Justified	too many sites on canvey	less housing and more infrastructure	No	Not Answered	Not Answered		Floodrisk on canvey Third road	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	N

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																		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. Third Road The plan has been subject to detailed Transport Assessment, including Canvey, assessing impacts and recommending interventions.	

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																		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. 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	

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																		Plan, and the development in the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan.	
0996-0001	Individual	Gemma	Ball		Yes	HAD4	No	This is an inappropriate question to ask someone whose background is not in local governance or planning policy. I cannot offer an opinion either way as to whether the plan is legally compliant.	No	Positively prepared	The definition of 'sound' provided states: "Positively prepared - provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". As a local resident, one of the needs of the area is very clearly improved infrastructure, specifically with regards to road layouts and traffic flow. There is constantly and consistently issues with traffic passing through Hadleigh. Focusing on the HAD4 development, [Redacted Personal Information]and so I have first hand experience of the roads immediately surrounding this proposed development, and have experienced these roads over the past three years. They are already not fit for purpose on a typical school run. The traffic is such that is regularly causes gridlocks and there are multiple, regular	To make the plan sound, it would need to include suggestions, backed up by evidence, as to how the addition of 140 homes on Scrub Lane would not negatively impact the parents and children of Hadleigh Infants and Hadleigh Junior school, along with the homeowners in the surrounding roads. It would need to introduce alternative, free, areas of parking with sufficient spaces for the families of all children at the schools within a safe, close, walkable distance. It would also need to demonstrate that the addition of 140 new homes, which brings with it the families living in those homes and their children, could be factored into the current levels of traffic flow (particularly at peak times), acknowledging that there is currently gridlock in the surrounding roads on a very regular basis.	No	Not Answered	Not Answered	A	Objecting to HAD4: Traffic Parking for school parents and school places	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 for school parents and school places Unfortunately this is an matter of Essex County Council as the Education Authority to address.	N

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											complaints form local homeowners to the schools about the traffic and parking, which often appear in the parents newsletters. The traffic is known to cause a lot of issues with local residents who live on Scrub Lane, Bilton Road, The Avenue, Church Road and Meadow Road, in particular. Scrub Lane is one of the primary places to park for Infants school parents as there is a large stretch of road, next to the proposed development site, which does not block driveways etc. Infants school parents try to be mindful of not causing chaos on Bilton Road (the front and main entrance to the Infants school) and do, where possible, park on Scrub Lane. For the moment, I am ignoring the impact of the additional 140 homes, purely looking at the current status of the roads; if this ability to park in Scrub Lane is removed it will cause undue detriment to the local residents surrounding the school, whilst also making it very difficult for parents to find free parking close to school. I do appreciate that the answer is "walk to school", however, my family is a prime example of why it is not always that simple [Redacted Personal	Looking at school catchments, scrutiny of the school places would need to be included. Not only an assessment of how many additional school places would be required and how this would be catered for from a practical perspective, but also how the school catchment zones would need to be considered. As above, this would likely have left my son unable to get a place in any of the three closest schools to our house because of the layout of the catchment zones.							

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											Information] is not feasible for working parents who have to drop their children off at 8.45am whilst still being home, logged on to work at 9.00am. In this modern age where the cost of living is so high, both parents have to work and so driving is becoming somewhat of a necessity as parents literally run back out of school to make it home in time for work (for those of us who are lucky enough to work from home/hybrid working etc.). For the reasons above, I feel the proposed development does not provide "a strategy which, as a minimum, seeks to meet the area's objectively assessed needs". To the contrary, it in fact worsens the current issues already experienced with parking and traffic flow and does nothing to provide any improvement. Now I wish to address school places; as I have eluded to above, my children were allocated to Hadleigh Infants school. I have provided my address as part of this consultation and so you will be able to look at the local schools and corresponding catchments. We applied to Westwood Academy, Thundersley Primary and Hadleigh Infants school.								

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											Westwood is a one form entry and is always over subscribed. We were not given a place despite this being the only school that we are technically in the catchment area for. Whilst we are not catchment for the other schools we applied as 'back-ups' being the next two closest school. I understand that Thundersley is also at capacity along with Hadleigh Infants. If you introduced 140 new homes right next to Hadleigh Infants school they would presumably be 'prime catchment', given the locality to that school. Had they existed at the time my children were applying to school, where would my children have been offered places? The suggestion of developing 140 homes right next to the school not only requires more school places in the area, but will also need consideration given to how this impacts the boundaries of school catchment zones. Taking this back to the question of, is the Draft Plan sound? Again, considering school placements, the answer has to be that it is not. The suggestion to develop these houses does not positively impact the areas objectively assessed needs.								

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											As above, it overburdens our schools and leaves children in the wider Hadleigh and surrounding areas at risk of not being allocated to local schools.								
0997-0001	Individual	Lynsey	Calvert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0998-0001	Individual	Kevin	Cassey		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0999-0001	Individual	Andrew	Iredale		Yes	SP3	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Too many houses for the infrastructure.	The number of houses proposed for exceeds the surrounding infrastructure of streets, health and education facilities.	No	Not Answered	Not Answered		Infrastructure concerns	Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure	N

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																		Delivery Plan (IDP).	
0947-0005	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	DH2	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County	No	Effective, Justified, Consistent with national policy	With regard to policy DH2, the policy is inconsistent with the NPPF, particularly in relation to Grey Belt policy. Sites meet the definition of Grey Belt if they do not perform strongly against purposes a), b) and d) of the Green Belt. In relation to purpose b) (to prevent neighbouring towns merging into one another) the PPG states that the purpose relates to towns, not villages. Daws Heath is a village. Policy DH2 should therefore be revised to acknowledge that there may be circumstances where sites meet the definition of Grey Belt, and would not make a strong contribution to purpose b) as Daws Heath is not a town. Schemes would, therefore, in accordance with national planning policy and guidance, be capable of being found acceptable. Policy DH2 is therefore inconsistent with national planning policy.	DH2 - Policy DH2 should be revised to acknowledge that there may be circumstances where sites meet the definition of Grey Belt, and would not make a strong contribution to purpose b) as Daws Heath is not a town. Schemes would, therefore, in accordance with national planning policy and guidance, be capable of being found acceptable. Policy DH2 is therefore inconsistent with national planning policy.	Yes	Not Answered	Yes	A	Policy DH2 is inconsistent with the NPPF, particularly in relation to Grey Belt policy. As Daws Heath is a village the policy should be revised to acknowledge that there may be circumstances where sites meet the definition of Grey Belt, and would not make a strong contribution to purpose b) as Daws Heath is not a town. Schemes would, therefore, in accordance with national planning policy and guidance, be capable of being found acceptable.	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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								Council (ECC) in relation to land north west of Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC’s correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC’s need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC’s view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of													

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								common ground should be made publicly available throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer’s report to Special Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant													

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								bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.											

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0947-0006	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Positively prepared	The Strategic Land Availability Assessment (SLAA) Methodology Report (January 2023) confirms that the Council has used the Urban Intelligence Place Maker tool, which relies on Land Registry data and artificial intelligence (AI) to identify vacant and underutilised land within urban areas. While AI is a tool capable of processing large datasets and identifying patterns, its outputs are only as reliable as the data inputs and prompts used to generate them. The methodology does not disclose: • What specific prompts or parameters were used, • How the AI model was trained or validated, • What safeguards were in place to prevent errors or bias, • Whether the outputs were manually reviewed or verified. Without transparency over the inputs, assumptions, and decision rules, there is a risk that the AI may have misclassified sites, particularly where land use is ambiguous or where ownership constraints exist. This is a known limitation of AI systems, especially when applied to complex spatial and legal	To ensure soundness, the Council should publish:	Yes	Not Answered	Yes	A	Critical of Strategic Land Availability Assessment (SLAA), particularly its reliance on AI.	Noted	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these." The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-			datasets. The absence of a clear audit trail or published outputs from the AI tool undermines confidence in the robustness of the site identification process. It also raises questions about whether the SLAA meets the requirements of paragraph 35 of the NPPF, which demands that plans be: • Justified – based on proportionate and transparent evidence; • Consistent with the requirements of national planning policy; • Effective – ensuring that sites are deliverable over the plan period; and • Positively prepared – to meet, as a minimum, objectively assessed development needs. To ensure soundness, the Council should publish: • The prompts and parameters used in the AI tool, • A list of sites identified by AI and how they were verified, • A statement on how AI outputs were reviewed and validated by officers. Until this is provided, the SLAA cannot be considered a fully transparent or proportionate basis for site selection. In the absence of								

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer’s report to Special Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified			this evidence, the sites selected for allocation cannot be considered to be effective over the plan period, and the plan cannot be said to be positively prepared, as the objectively assessed needs for the borough will not be met as a minimum.									

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.											

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0947-0007	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	SLAA	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Positively prepared, Justified, Consistent with national policy	The suitability of sites considered the physical circumstances of sites and policies set in the NPPF. There are 24 criteria that were used and ranged from statutory designations, Flood Risk Zones, accessibility to public transport (distance to bus stops) and noise. Very important criteria were awarded a 3 score and the least important awarded a 1 score. The full list is on pages 5-6 of the report. The SLAA (July 2025) confirms that land east of Rayleigh Road, Thundersley (Site ID 40492) is suitable, viable and available for residential development, with an indicative capacity of between 962 and 1,604 dwellings depending on assumed density. The site scores positively across the majority of assessment criteria, with no insurmountable constraints identified. Matters raised including proximity to a Local Wildlife Site, the presence of badger setts, Tree Preservation Orders, and heritage/archaeology considerations are all capable of being addressed through established and recognised forms of mitigation at the planning application stage (indeed, this was recognised by		Yes	Not Answered	Yes	A	In respect of site "land east of rayleigh road" (ID 40492) known as GB13 the Slaa identifies that the site is suitable, viable and achievable which is not consistent with the transport assessment of the sustainability appraisal. Concern that the larger site was assessed to make it seem like it was undeliverable.	The purpose of the SLAA is not to create the strategy for the Plan, it is part of the technical evidence base for the Castle Point Plan which complements other important sources of information such as public consultation and the Sustainability Appraisal. Together these sources of evidence inform the strategic planning decision-making process. Therefore, the SLAA is not the sole source of evidence. The Castle Point Plan I Strategic Land Availability Assessment (SLAA) - July 2025 does not inform which sites should be allocated for development, but instead it contributes to the Council's understanding of	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC’s correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC’s need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC’s view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-			statutory consultees in relation to the previous planning application on the site – 23/0085/OUT). The Council’s evidence base in respect of site GB13 is inconsistent and therefore unsound. The SLAA identifies the site as available, suitable, and achievable, with no indication that access or transport constraints would render the site unsuitable for allocation. However, the Transport Assessment presents the site in a markedly negative light, identifying highways and access issues that are not carried through or reflected in the SLAA, Sustainability Appraisal, or wider site selection process. This discrepancy undermines the robustness of the evidence base and suggests that the site has not been assessed in a fair or consistent manner when compared with other potential allocations. The Council’s evidence base (SLAA 2025, Benfleet/Hadleigh/Thunder sley/Daws Heath – Site Assessments) identifies a smaller parcel, GB13a (East of Rayleigh Road), which more closely aligns with the area being promoted by the developer. Importantly, this								what land is developable. The Green Belt assessment 2025 further assessed sub sections of sites to build upon the earlier greenbelt evidence produced in 2018. This found that in respect of sub-areas GB 13 the assessment has concluded that the full extent of the sub-area is not recommended for further consideration. However, it is concluded that part of the sub-area can be recommended for further consideration given that this reduced part of the sub-area would result in reduced potential harm to the Green Belt. This is further detailed within the report.	

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer’s report to Special Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified			assessment demonstrates that GB13a performs significantly better than the wider GB13 parcel, achieving a higher unmitigated suitability score of 61. The assessment finds the site to be Viable, Available (subject to confirmation), and Developable, and records that all identified constraints (such as drainage, TPOs, and archaeology) are readily mitigable through established design measures (e.g. SUDS, tree protection, archaeological recording). This contrasts with the wider GB13 assessment, which overstates harm by considering a larger parcel not reflective of the developer’s intentions. The SLAA also recognises that the site could deliver between 429 and 715 dwellings at standard densities, representing a meaningful contribution to the borough’s housing need. The Council’s own evidence therefore supports the conclusion that GB13a is both a suitable and realistic development option. The SLAA awards GB13a mid-level scores for both “Service Accessibility” and “Sustainable Accessibility,”								

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.			confirming that the site is within walking distance of some services and within 800m of a bus stop served at least hourly. These scores indicate that transport access is reasonable and capable of improvement through standard mitigation. However, the Transport Assessment presents the site as severely constrained, without reconciling this with the SLAA findings or exploring mitigation. This inconsistency undermines the robustness of the evidence base and suggests that transport constraints have been selectively emphasised to discount the site.								

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0947-0008	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Positively prepared, Effective, Justified	From reviewing the evidence base prepared in support of the Castle Point Plan, CODE has substantial doubts regarding the capacity of the urban area to accommodate the number of homes shown for allocation within policy SP3 (Meeting Development Needs). In particular, there is a lack of transparency and certainty regarding presumed capacities of sites, and their deliverability. The evidence base is confusing and does not provide the required level of clarity to ensure transparency in the assumptions applied, and how these have been assessed by CPBC to translate into housing allocations. The Development Options Technical Paper (July 2024) outlines a draft urban capacity for the borough of 3,727 new homes (net capacity of new allocations of 2,204 homes, due to uncertainties over the likelihood of residential development coming forward to replace existing business or services provided on sites + 1,523 dwellings of existing commitments). Capacities on proposed allocation sites (for the		Yes	Not Answered	Yes	A	From reviewing the evidence base prepared in support of the Castle Point Plan, CODE has substantial doubts regarding the capacity of the urban area to accommodate the number of homes shown for allocation within policy SP3 (Meeting Development Needs). In particular, there is a lack of transparency and certainty regarding presumed capacities of sites, and their deliverability. The evidence base is confusing and does not provide the required level of clarity to ensure transparency in the assumptions applied, and how these have been assessed by CPBC to translate into housing allocations. For CPBC to meet its objectively assessed housing needs over the plan period, it will have to consider the release of Green	Noted	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC’s correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC’s need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC’s view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-			purposes of the development options technical paper) appear to have been calculated on the basis of percentage reductions based upon whether a site is currently accommodating community buildings and supermarkets (50% reduction in capacity), auto sites (25% reduction) and other uses such as industrial sites and garage sites. The presence of existing uses, including supermarkets which are unlikely to vacate existing premises, raises significant concerns over deliverability. However, the Housing Topic Paper (July 2025) details an additional exercise undertaken in the form of a Density and Capacity Study (July 2025), which was undertaken to “determine site constraints and opportunities and high level urban design principles to justify the urban sites potential capacity”. The Density and Capacity Study notes that the capacity assessments “are based on a summary of the overall site constraints, the surrounding built context, Identity Area characteristics and connectivity level, landscape sensitivity and other site-specific							Belt sites to enable a sufficient number of new market and affordable homes to be delivered in the borough over the course of the plan period. As highlighted within these representations, the record of affordable housing delivery in CPBC is abysmal. Unless and until CPBC recognises the land available within the borough to accommodate new housing (and which can support the provision of much needed infrastructure across the borough), there will continue to be a substantial shortfall in affordable housing provision. The local plan as drafted is not positively prepared, justified or effective for the provision of new homes over the course of the plan period.		

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council (for the meeting on 23 July 2025) that "The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need." However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified			constraints". Importantly, the document states, "The location and mix of development parcels and site infrastructure should be influenced and refined with more detailed analysis and we would recommend that parking integration, green and blue infrastructure and the mix of uses are considered in line with the aspirations of National and Local policy." The Density and Capacity Study then presents a range of dwellings which could be accommodated on each of the potential allocation sites. There is no clarity provided within the evidence base as to whether CPBC has selected the higher or lower number within the range, or a figure within the range, for the allocations, to achieve the overall number of dwellings to be allocated within the urban area of 4,868 homes. There can be no certainty or confidence in the ability of the Castle Point Plan to deliver the allocations which are included within the plan, over the course of the plan period. The simple nature of a significant number of the allocated sites benefitting from existing commercial and other uses, with no								

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.			certainty over their intention to close their existing premises, cannot instil any confidence in the effectiveness of the local plan. The arbitrary reductions applied within the Development Options Topic Paper does not overcome the significant obstruction for delivery – the nature of many of the proposed allocation sites simply not being available or achievable for development. For CPBC to meet its objectively assessed housing needs over the plan period, it will have to consider the release of Green Belt sites to enable a sufficient number of new market and affordable homes to be delivered in the borough over the course of the plan period. As highlighted within these representations, the record of affordable housing delivery in CPBC is abysmal. CODE is mindful of the conclusions of the inspector for the appeal on land rear of 248 Hart Road, Thundersley , at paragraph 46: “The SoCG [Statement of Common Ground] also alludes to problems of delivery of affordable homes in the Borough. Moreover, the evidence								

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											before me demonstrates only 130 affordable homes were constructed between 2014 and 2022, but this does not include the 56 homes within existing stock transferred through Right to Buy over that period. The net figure of affordable homes built is therefore 74 or nine dwellings per annum, which equates to six percent of all homes built.” The inspector continued, at paragraph 47: “To add to this, data from DLUHC presented in the appellants’ report by Savills indicates affordable housing stock within Castle Point represents only a small proportion of the total stock (5.41 percent), which is significantly below the Essex average of 14.21 percent and 16.4 percent for England. The Council therefore has very limited existing affordable housing stock and is falling significantly short of meeting its assessed need. Moreover, waiting times for 1-bed properties are 12-18 months, 18-24 months for 2-bed homes, and 30-36 months for a 3-bed house. As such, the outlook is very bleak for the significant number of households on the Housing Register, which has increased year-on-year.								

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											but is unlikely to capture all those in need of affordable housing, with the overall housing need likely being much greater. To add to this, the appellants’ evidence demonstrates there are considerable affordability problems with house prices and rent levels in the Borough, which are increasing.” Unless and until CPBC recognises the land available within the borough to accommodate new housing (and which can support the provision of much needed infrastructure across the borough), there will continue to be a substantial shortfall in affordable housing provision. The local plan as drafted is not positively prepared, justified or effective for the provision of new homes over the course of the plan period.								

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0947-0009	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of Thundersley, which is	No	Positively prepared, Effective, Justified, Consistent with national policy	Sites like land east of Rayleigh Road, Thundersley have previously been identified as a suitable location for new housing in the borough by the very same local planning authority (and found sound further to examination) and which have been reviewed by statutory consultees who have offered no technical objections to the proposals (including from Essex County Council's highways team). Land east of Rayleigh Road is a site which can provide a significant number of new market and affordable homes (in comparison with the record of delivery in the borough since 2011). The site can come forward now to ensure that sufficient housing is provided to meet the genuine needs of local people. Land east of Rayleigh Road should therefore be considered for allocation to assist the Council in meeting its local housing needs. Whilst the site is within the Green Belt, it follows sustainable patterns of development and is located to the south of the Rayleigh Retail Park, which features a range of retail and hardware facilities,		Yes	Not Answered	Yes	A	Argues that Site GB13 should have been allocated.	Noted	N

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								acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC’s correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC’s need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC’s view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.” The NPPF further clarifies that such statements of common ground should be made publicly available throughout the plan-			including a supermarket. The retail park also offers other employment opportunities in the form of light industrial offices, workshops and further retail space. The retail park is within a suitable walking distance from the appeal site. There are a number of important local facilities in Thundersley, Rayleigh and Hadleigh, including schools, leisure, retail and employment. These meet many of the day-to-day needs of existing local residents in Hadleigh, reducing the need to travel outside of the Borough. The site would therefore be consistent with the NPPF’s drive to promote sustainable patterns of development and the site is in accordance with, and can support, the aims outlined in paragraphs 110 to 115 of the NPPF. The overall conclusion of the Green Belt Assessment (GBA, July 2025) is that Site GB13 potentially meets the definition of Grey Belt. In our opinion, the smaller promotion site does indeed meet the definition of Grey Belt when correctly considering the sites role relative to purpose a, b and								

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								making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer's report to Special Council (for the meeting on 23 July 2025) that "The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need." However, it is important to note paragraph 26 of the NPPF which stipulates, "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified			d only (rather than purpose a, b and c in the Councils July 2025 GBA), and as such therefore development is not inappropriate. The promotion site is not subject to any other designation that would restrict development relative to the designations set out at NPPF footnote 7. Furthermore, it should be noted that the site is contained by development and / or road corridors to the north, south and west and to the east the Little Haven Nature Reserve. As such, any development extent is constrained by these robust and enduring land uses and designations. A medium-high landscape sensitivity rating is given in the Landscape Sensitivity and Outline Appraisal (November 2024), this again considers the whole of Site GB13. It is to be noted that the Site is not subject to any landscape designation at the local or national level, nor are views from publicly accessible vantage points across the site protected in policy terms. It is therefore considered that with a sensitive design approach, one which relates to those areas readily influenced by the existing settlement edge, development of the								

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								strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively.			site could come forward in a way that minimises landscape and visual harm to the site and local level and does not harm the Green Belt purposes when considering the plan area as a whole.								

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0947-0010	Agent	Liam	Ryder	Rosconn Group c/o CODE Development Planners Ltd	Yes	SP3	No	Within these representations CODE identify fundamental failings in CPBC's Sustainability Appraisal (SA) in relation to the appropriate consideration of reasonable alternatives. CODE is particularly concerned at the total absence of consideration for the reduced area of land east of Rayleigh Road, Thundersley (site GB13) from consideration within the SA, which is identified in other evidence base documents (including the Green Belt Assessment, July 2025) as potentially meeting the definition of Grey Belt (and thereby not being considered to be inappropriate development in the Green Belt, subject to meeting the NPPF's golden rules). In addition to the substantial concerns regarding the SA, CODE has also identified concerns regarding the lack of clarity over CPBC's accordance with the Duty to Cooperate. The Duty to Cooperate evidence section on the local plan website is limited to one statement of common ground (SOCG) between CPBC and Essex County Council (ECC) in relation to land north west of	No	Positively prepared, Effective, Justified, Consistent with national policy	The plan is not positively prepared, justified, effective or consistent with national policy for the reasons discussed in these representations. The plan does not provide for its full, objectively assessed needs (and the justification provided by CPBC in support of an alternative strategy is insufficient and not in accordance with national planning policy). The plan is not justified by its evidence base, which, inter alia, clearly finds several sites (including land east of Rayleigh Road, Thundersley – site GB13) as being capable of meeting the definition of Grey Belt (which, in accordance with national planning policy and assuming the golden rules outlined in paragraphs 156 and 157 are met) and therefore not representing inappropriate development in the Green Belt. As outlined within the NPPF (paragraph 146), exceptional circumstances for the review of Green Belt boundaries includes instances where a local planning authority cannot meet its identified need for homes. In those cases, the NPPF requires local planning authorities to review Green Belt		Yes	Not Answered	Yes	A	The plan is not positively prepared, justified, effective or consistent with national policy for the reasons discussed in these representations. The plan does not provide for its full, objectively assessed needs (and the justification provided by CPBC in support of an alternative strategy is insufficient and not in accordance with national planning policy). The plan is not justified by its evidence base, which, inter alia, clearly finds several sites (including land east of Rayleigh Road, Thundersley – site GB13) as being capable of meeting the definition of Grey Belt (which, in accordance with national planning policy and assuming the golden rules outlined in paragraphs 156 and 157 are met) and therefore not	Noted	N

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								Thundersley, which is acknowledged within to not be a viable option for allocation in the current local plan (and nor was it appropriate for allocation in the previously withdrawn local plan). It is difficult to establish CPBC's correspondence and cooperation with its neighbours regarding requests to accommodate some of CPBC's need, particularly in light of the statements made within the Castle Point Plan, and across the evidence base, regarding perceived local constraints which (in CPBC's view) excludes Green Belt sites from consideration for allocation. Indeed, paragraph 28 of the NPPF states, "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these." The NPPF further clarifies that such statements of common ground should be made publicly available			boundaries in accordance with the policies in the Framework to propose alterations ot meet those needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt, when considered across the area of the plan. As outlined in the earlier sections of these representations, where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed, and then other Green Belt locations. This exercise has plainly not been undertaken by CPBC. The Green Belt Assessment (July 2025) recommends that CPBC considers potentially altering the Green Belt boundary at 16 locations. The net change in Green Belt if all these potential alterations were implemented would be a 25.5ha reduction in Green Belt area (GB13 is included in the list of sites for further consideration). It should be noted that, in a borough which comprises 2,750ha of Green Belt land (as highlighted in paragraph						representing inappropriate development in the Green Belt. Concerns about approach to Green Belt, consistent with the NPPF. As outlined in the earlier sections of these representations, where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed, and then other Green Belt locations. This exercise has plainly not been undertaken by CPBC.		

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								throughout the plan-making process to provide transparency. The publication of one statement of common ground which relates to a specific part of the borough, and which is not included in the local plan for consideration as an allocation is not sufficient to demonstrate appropriate co-operation with neighbouring authorities. It is noted within the officer’s report to Special Council (for the meeting on 23 July 2025) that “The key issue which is to be finalised is a final decision from adjoining and nearby councils on whether they can accept any of the unmet need from Castle Point (between 4,736 and 6,511 dwellings). This can only be completed once the Council has published its Regulation 19 draft Castle Point Plan and has specified the level of unmet need.” However, it is important to note paragraph 26 of the NPPF which stipulates, “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively			2.1.2 of the Green Belt Assessment (July 2025)), a release of 25.5ha of Green Belt land would represent just 0.927% of the total Green Belt land in CPBC. Evidently, the release of these sites, in order to meet objectively assessed housing needs, would not undermine the purposes of the remaining Green Belt across the area of the plan as a whole. Instead of considering the release of these sites, CPBC has concluded that Green Belt release would not be appropriate in the borough. The Sustainability Appraisal contains no such assessment, and, as flagged in these representations, does not transparently assess reasonable alternatives.. In addition, the Housing Topic Paper (July 2025) states, “The Council has exhaustively explored every reasonable alternative sources of land tested against the Green Belt Review, SFRA, LNRS, Landscape Sensitivity Assessment, Site Accessibility and Suitability, Heritage Impact Assessments and the borough wide Transport Assessment. This rigorous process means the sites proposed for allocation in								

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								prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular area could be met elsewhere.” The Duty to Cooperate is a gateway test for the soundness and legal compliance of a local plan. In light of the requirements of paragraph 26 of the NPPF, it is not acceptable to seek to satisfy the requirements of the Duty to Cooperate post-submission as joint working between strategic policy making authorities should have been undertaken throughout the preparation of the Castle Point Plan and cannot be applied retrospectively. CODE therefore reserves the right to comment on the whether the duty to cooperate has been satisfied in further representations to the local plan examination, upon publication of further evidence.			the Plan represent the maximum amount of land that can be released for housing without causing unacceptable harm to flood safety, biodiversity, landscape character, heritage assets or the strategic road network. Releasing any further Green Belt land would breach one or more of those constraints and is therefore neither justified nor sound under the December 2024 NPPF.” However, such a conclusion is pre-emptive and does not consider the ability of sites to overcome constraints. Paragraph 110 of the NPPF is clear that development should be focussed on locations which are, or which can be made to be sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Land east of Rayleigh Road is evidently a sustainable location, in close proximity to existing services and facilities. There is an opportunity to encourage new residents towards sustainable transport opportunities, including walking and cycling, with the benefit of key services and facilities within appropriate distances. This was								

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											accepted and encouraged by Essex County Council's Highways team in response to application 23/0085/OUT. To rectify the identified concerns regarding the soundness of the local plan and its evidence base, CPBC should consider opportunities to release Green Belt land (focussing first on grey belt sites such as GB13) to meet its objectively assessed housing needs in full. Failure to do so will likely lead to the local plan being found unsound at examination, with further subsequent delays to plan making in a borough with a chronic shortfall in housing supply, particularly for affordable housing for which the need is already acute. The plan's focus on brownfield sites is not effective and will risk further worsening the acute shortfall in new housing across the borough, and in particular the existing lack of affordable housing (the affordable housing stock in the borough, in light of the right to buy, continues to decrease without a sufficient supply of new affordable homes being constructed locally.									

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											Finally, these representations identify several instances in which the Castle Point Plan has not been prepared in consistency with national planning policy and guidance. The plan is therefore unsound, and CPBC should consider reviewing the plan in advance of submission for examination to ensure the plan, as a minimum, seeks to meet its objectively assessed housing needs and plans positively to invest in local infrastructure to support existing and future communities.								
1001-0001	Individual	Lucy	Morgan		Yes	HAD4	Yes		No	Justified	I would like to object to the Had4 - Land South of Scrub Lane proposal. My concerns are relating to welfare and safety of the children at Hadleigh infant and junior school no only during an construction will it be unsafe, loud and disruptive but 114 new homes on that small plot will be overlooking the children's playground and	Remove Had4 - Land South of Scrub Lane proposal.	Yes	Not Answered	Not Answered		Objecting to Had4 because: Traffic Parking Density Infrastructure	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	N

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											playing field. My son attends that school and I would not be comfortable with the school being so overlooked. Also the area is a high traffic area as it is, especially due to it's close proximity to the school and to the high street. There is already issues with traffic here due to parked cars and traffic lights. Adding construction to this area would cause a lot of issues for all nearby residents and locals. In addition the local doctors and dentists are up to capacity and the schools oversubscribed. I strongly disagree with the proposal and object fully.								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 Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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1440-0001	Organisation	Joe	Beale	RSPB	Yes	ENV 1	Yes		Yes		There should be provision included to enable conservation organisations such as the RSPB to install any further predator exclusion fences on West Canvey Marshes. They may potentially be considered to affect landscape character, but an exemption clause for reasonable, evidence-based use to enhance biodiversity should be provided in Policy to allow the RSPB - and others as appropriate - to continue important work for nature.	There should be provision included to enable conservation organisations such as the RSPB to install any further predator exclusion fences on West Canvey Marshes. They may potentially be considered to affect landscape character, but an exemption clause for reasonable use to enhance biodiversity should be provided in Policy.	No				There should be provision included to enable conservation organisations such as the RSPB to install any further predator exclusion fences on West Canvey Marshes. They may potentially be considered to affect landscape character, but an exemption clause for reasonable, evidence-based use to enhance biodiversity should be provided in Policy to allow the RSPB - and others as appropriate - to continue important work for nature.	Covered in supporting text to ENV5 rep	18.43 The hedgehog is now officially National Hedgehog Conservation Strategy, published in October 2024. 'Conservation' fencing, such as predator exclusion fences installed on reserves by conservation organisations, may be exempt from the requirement, as appropriate

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1440-0002	Organisation	Joe	Beale	RSPB	Yes	DH1	Yes		Yes			Please change 'fritillary' to Heath Fritillary butterflies in point 2 Please correct the typo 'heath' and alter to 'health' in point 4	No				Please change 'fritillary' to Heath Fritillary butterflies in point 2 Please correct the typo 'heath' and alter to 'health' in point 4	Agreed	Policy DH1 2. The Council will continue to support opportunities for restoration, enhancement and creation of habitats in the area, particularly priority habitats and habitats benefiting protected/priority species including heath fritillary butterflies, badgers and southern wood ants. 4. The area's

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																			recreational role will be protected and enhanced with opportunities for managed passive recreation, focusing on health, wellbeing and education value.
1440-0003	Organisation	Joseph	Beale	RSPB	Yes	SP4	Yes		No		There should be mention of developer RAMS contributions.	There should be mention of developer RAMS contributions.	No				There should be mention of developer RAMS contributions.	RAMs is covered by Policy ENV3(1b). However a cross reference can be added from the supporting text of SP4	New para 6.67 As set out in policy ENV3, developments may also be required to satisfy the requirements of the Habitats Regulations by making contribu

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																			tions as defined in the Essex Coastal Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) or by the provision of sustainable accessible natural greenspace (SANG) or SANG-like provision.
1440-0004	Organisation	Joe	Beale	RSPB	Yes	SD6	Yes		Yes		Given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate populations would be welcome here.	Modifications:: Section 21.56 addition - given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate populations would be welcome here.	No				Requested Modifications: Section 21.56 addition - given the important invertebrate populations in Castle Point, further reference to the impact of artificial light on invertebrate	21.56 already highlights the impacts of light pollution on 'nature conservation'. This would include invertebrates but also other species that are negatively	N

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																	populations would be welcome here.	affected, such as bats.	
1440-0005	Organisation	Joseph	Beale	RSPB	Yes	T2	Yes		No	Justified	Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.	It should be clarified in Policy that any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.	No				It should be clarified in Policy that any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.	Agreed. Mod proposed.	Policy T2 9. Any improvements to accessing Canvey Island must avoid any adverse effects on the integrity of Habitats sites and minimise impacts on designated sites, priority habitats and species, including functionally linked land and habitat connectivity.

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1440-0006	Organisation	Joe Seph	Beale	RSPB	Yes	C4	Yes		No	Justified, Consistent with national policy	Depending on where the 2000 new homes are located within this allocation, and the approach taken to the non-residential construction, there could be serious negative impacts on Canvey Wick Site of Special Scientific Interest (SSSI), including to key populations of Essex Local Nature Recovery Scheme (LNRS) Priority Species Nightingale and Shril Carder Bee. There must be no increase in harmful recreational impacts on this SSSI or to the RSPB reserve. Paragraph 8.39 states the aim for Canvey Wick SSSI and West Canvey Marsh to help "provide recreation". Canvey Wick has experienced fires and other recreational damage in recent years, and this sensitive and important site must be safeguarded with a suitable buffer zone and other mitigation measures. Other issues affecting the site and its biodiversity include artificial light pollution, disturbance to wildlife, and nutrient deposition to the specialised nutrient-sensitive flora from dog waste. Measures to prevent new residential areas being built near the SSSI, and to discourage direct access onto the SSSI area from any	The RSPB is greatly concerned about the plans in Policy C4 for a broad location next to Canvey Wick SSSI and near West Canvey Marsh RSPB reserve, especially the 2000 homes. Canvey Wick SSSI is nationally important for invertebrates, and important for species such as Nightingale, and therefore a source of pride for Castle Point. There is great responsibility for its appropriate treatment. We urge that any new housing be located at the eastern end of the broad location, well away from the vulnerable wildlife, and with business or industrial units separating new residential buildings from the SSSI. There should be no added lighting, pollution, and disturbance impacts. To avoid harm to the SSSI and West Canvey Marsh RSPB reserve, please clarify Policy C4 as follows: 1) Clarify that any new residential units (2000 homes) will be allocated to the eastern end of the broad location zone, well away from the SSSI and surrounding area, ideally outside a buffer zone of 400m; 2 Clarify that a substantial protective buffer zone to Canvey Wick SSSI will be	No				The RSPB is greatly concerned about the plans in Policy C4 for a broad location next to Canvey Wick SSSI and near West Canvey Marsh RSPB reserve, especially the 2000 homes. Canvey Wick SSSI is nationally important for invertebrates, and important for species such as Nightingale, and therefore a source of pride for Castle Point. There is great responsibility for its appropriate treatment. We urge that any new housing be located at the eastern end of the broad location, well away from the vulnerable wildlife, and with business or industrial units separating new residential buildings from the SSSI. There should be no added lighting, pollution, and disturbance impacts. To avoid harm to the SSSI and West	Concerns mostly accepted. Mods to policy proposed	9- Appropriate links into multi-function at green infrastructure to the west of the site whilst avoiding adverse harm to biodiversity through recreational impacts, or other impacts arising from urban development. 9) A strategy that minimises impacts upon the SSSI and does not impede LNRS aims of

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											new residential development that is built in the broad location, should therefore be implemented, and alternative green space for dog walking provided, but these are not yet specified in this Policy. Many recreational impacts, such as predation by domestic cats, will be lessened if the surrounding area to the SSSI is business or industrial units rather than residential (any new residential units should be situated towards the eastern end of the broad location), but this must be clarified in Policy and there must still be a careful approach. We strongly urge a substantial protective buffer zone to Canvey Wick SSSI, within which there would be no new residential development, ideally of 400m or more. This is partly to protect vulnerable, ground-nesting Nightingales, an LNRS Priority Species, which have an important population at the SSSI. Nightingales are a Red-listed species of conservation concern due to substantial declines in their national population of about 90% over the past 50 years. The national census, carried out in 2012 and	applied, within which there would be no new residential development, ideally of 400m or more to reduce impacts from recreation and pets; 3) Clarify that any new development within the buffer zone and closer to the SSSI will be business or industrial units, and that these will not add pressures to the SSSI nor impede LNRS aims of connectivity; 4) Remove the "provide recreation" from Paragraph 8.39; 5) Specify that any new residential units will not encourage direct access onto the SSSI area; 6) Specify provision of well-designed alternative green space or park for dog walking, away from the SSSI, to help alleviate pressure on the designated site and surrounds; 7) Ensure implications of lighting and noise are fully mitigated for any new developments near to the SSSI and West Canvey Marsh to avoid causing harm, such as to the invertebrate features of the SSSI, as well as to bats. Low or zero lighting, timer use, sensors, and other measures, need to be applied on or around sites of high invertebrate/nature value, as there is considerable					Canvey Marsh RSPB reserve, please clarify Policy C4 as follows: 1) Clarify that any new residential units (2000 homes) will be allocated to the eastern end of the broad location zone, well away from the SSSI and surrounding area, ideally outside a buffer zone of 400m; 2 Clarify that a substantial protective buffer zone to Canvey Wick SSSI will be applied, within which there would be no new residential development, ideally of 400m or more to reduce impacts from recreation and pets; 3) Clarify that any new development within the buffer zone and closer to the SSSI will be business or industrial units, and that these will not add pressures to the SSSI nor impede LNRS aims of connectivity;		connectivity; via sensitive consideration of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to avoid adverse impacts 10) Enhancements that complement the designated features and features of interest of

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											2013, revealed that fewer than 5500 singing males remain in the UK. Nightingales nest on or near the ground, therefore their eggs and young are at higher risk from ground predators and accordingly vulnerable to the man-made pressures of recreational disturbance and urbanisation effects. If housing is placed too close to the SSSI, long-term urbanisation impacts could arise, including disturbance from noise and artificial lighting, recreational disturbance and the serious pressure of predation by domestic cats that would arise from new residential development near the site. Experience from similar sites, such as the protection of important populations of heathland birds from the indirect effects of urban development in southern England, indicates that it is not usually possible to mitigate the acute impacts on vulnerable ground-nesting birds from housing located in close proximity to the protected sites. Based on our understanding of the available scientific evidence of cat roaming	scientific evidence around the impact of artificial lighting on invertebrates. 8) Any development in this area should include enhancements that complement the designated features and features of interest of Canvey Wick SSSI. For example, any redevelopment of the adjacent area should factor in features that we will support increased biodiversity, in particular scarce and rare invertebrates. This can be done by including brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, and use of waste material such as crushed concrete in gabion baskets, are all examples of this. 9) Development should also not impact on RSPB West Canvey Marsh; through water quality impacts, recreational disturbance, and habitat degradation. This is partly covered in the plan in Section 8.40: 'The nature conservation sites at west Canvey are however sensitive to recreational activities and urban development so it is important that the Master Plan deals with this in an appropriate manner'. This caution should be					4) Remove the "provide recreation" from Paragraph 8.39; 5) Specify that any new residential units will not encourage direct access onto the SSSI area; 6) Specify provision of well-designed alternative green space or park for dog walking, away from the SSSI, to help alleviate pressure on the designated site and surrounds; 7) Ensure implications of lighting and noise are fully mitigated for any new developments near to the SSSI and West Canvey Marsh to avoid causing harm, such as to the invertebrate features of the SSSI, as well as to bats. Low or zero lighting, timer use, sensors, and other measures, need to be applied on or around sites of high invertebrate/nature value, as there is considerable scientific evidence			Canvey Wick SSSI. Redevelopment of the adjacent area should factor in features that we will support increased biodiversity, in particular scarce and rare invertebrates, via measures such as green roofs, brownfield habitat, sandy planted areas/sandbanks and use of waste material such as crushed concrete in

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											distances this can range from 360m to 2.4km, with fences and hedges presenting little obstacle to this. We consider that 400m would be an appropriate buffer for the SSSI to any new residential units; the evidence suggests that this would avoid most cats entering the SSSI, in addition to reducing the effects of other disturbance to breeding Nightingales and other species as a result of human recreational impacts. Given the above comments, in the absence of written clarity in Policy C4, aspects of this Policy may not comply with: the Essex LNRS aims for Priority Species and enhancement and connecting Areas of Particular Importance for Biodiversity (APIB); the tests and robust policies set out in the National Planning Policy Framework (NPPF) in relation to developments in proximity to Sites of Special Scientific Interest (SSSIs); and Section 40 of the Natural Environment and Rural Communities Act 2006 on the duty of Councils to conserve and enhance biodiversity. In addition, Paragraph 174 of the NPPF states:	emphasised and enacted through precautionary measures such as those raised for Canvey Wick.						around the impact of artificial lighting on invertebrates. 8) Any development in this area should include enhancements that complement the designated features and features of interest of Canvey Wick SSSI. For example, any redevelopment of the adjacent area should factor in features that we will support increased biodiversity, in particular scarce and rare invertebrates. This can be done by including brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, and use of waste material such as crushed concrete in gabion baskets, are all examples of this. 9) Development should also not impact on RSPB West Canvey Marsh; through water quality			gabion baskets . 10) Well-designed alternative green space or park for dog walking, away from the SSSI, to help alleviate pressure on the designated site and surrounds;

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											“Planning policies and decisions should contribute to and enhance the natural and local environment by a) “protecting and enhancing...sites of biodiversity” and; d) “minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.” As it stands Policy C4 may be placing Canvey Wick SSSI, its designated features and other key wildlife of national importance, at increased risk.						impacts, recreational disturbance, and habitat degradation. This is partly covered in the plan in Section 8.40: 'The nature conservation sites at west Canvey are however sensitive to recreational activities and urban development so it is important that the Master Plan deals with this in an appropriate manner'. This caution should be emphasised and enacted through precautionary measures such as those raised for Canvey Wick.		
1003-0001	Individual	Danielle	Flanders		Yes	HAD4	Yes		Yes			Please do not build more houses here, its already super busy, traffic is a nightmare as is parking for the schools, plus there is a huge huge safety concern in terms of the flats looking over a school and school field of the infants school. Its putting children in a vulnerable position. There are so many other useful things that could be done	No	Not Answered	Not Answered	A	Objecting to Had4 because: Traffic Parking Overlooking Infrastructure	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	N

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												with the land, please reconsider! Its a hugely overpopulated area already. Please please reconsider and do not build anymore flats or housing here.						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. Overlooking Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure	

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																		Delivery Plan (IDP).	
1004-0001	Individual	Kathryn	McCarthy		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1005-0001	Individual	Sam	Flanders		Yes	HA D4	Yes		Yes			Hadleigh and scrub lane in particular is over populated as it is. There are far too few schools and school places available and very little parking. Traffic is terrible especially during school drop off and collection without the added flats. There is also a concern over the fact that the flats will overlook the infants school and the school field. There is more than could be done with that space rather than putting in a block of flats. The area does not need any more housing.	No	Not Answered	Not Answered		Objecting to Had4 because: Traffic Parking Overlooking Infrastructure	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	N

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																		requires the EPOA Parking Guidance (Part 1 and 2) to be implemented. Overlooking Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1006-0001	Individual	Peter	STREET		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1007-0001	Individual	Paul	O'Leary		Yes	SP3	Yes		No	Justified		No further building on Canvey until the road network is capable of sustaining the extra traffic	No	Not Answered	Not Answered		Transport capacity on Canvey Island	The plan has been subject to detailed Transport	N

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												that would be generated by this plan.						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 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.	

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1008-0001	Individual	Monica	Pitts		Yes	SP3	No	Failed to consider strategic alternatives like North West Thundersley and 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/greybelt against new NPPF guidelines. It is not justified, the site selection strategy is based 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/greybelt sites added and the exclusion of north west Thundersley site. I do totally agree with Had 2 Policy for the Hadleigh Farm area which states this site as environmental, recreational, nature recovery, biodiversity, agricultural farming activities, nature conservation, SSS1, 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 as not suitable for development but this unsound plan for 6,200 homes puts the Hadleigh	Add North West Thundersley site, 187 Ha, as a Greenbelt/brownfield site option for 7,500 homes, reduce the urban housing target to 3,500 from 6,200 with Canvey at 1,050 and Gsdkeigh at 305. Total housing target of 11,000	No	Not Answered	Not Answered		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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											farmland site (GB8), at risk to speculative development, needing planning objections with respect to urban sprawl. It is a buffer zone. The effect on highways and traffic - lack of infrastructure, protecting our farmland and wildlife, out of character, open space, heritage, archeology, promoting historic lincs and greybelt land must be used first. Any development on this site affects 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 hopefully SA 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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1009-0001	Individual	Ron	Heyfron		Yes	SP3	No	The plan fails to meet targets imposed and this invites the central government of intercede	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	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, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered		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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											suitable for development, but this unsound plan for 6,200 homes, put's the Hadleigh farmland site at risk to speculative development, needing planning objections with respect to urban sprawl, it's a buffer zone, the effect on highways and traffic, lack of infrastructure, protecting our farmland andwildlife, out of character, open space, heritage, archaeology, promoting historic links, and use 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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																		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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1010-0001	Individual	Alan	Hughes		Yes	SP3	No	I do not have the specific knowledge to comment	No	Positively prepared, Effective, Justified	I do not consider that it meets the needs of the Area. The plan suggest the vast majority of new homes to be built on Canvey Island. Ever since I have lived here there have only been surveys that have stated how unprepared we are for the current population on Canvey, The roads are under stress from the increase in numbers and traffic evidenced by the poor road quality . The traffic flow increases every year therefore the traffic flow slows down every year , as witnessed by the traffic jams around and off the Island - such as Long Road and all school areas. Lack of parking areas or street parking again impedes traffic flow. The sewerage on Canvey is dire as the pipework is undersized and at breaking point. the pipework is 3 inches diameter and blocks frequently in certain areas especially Orange Road to name but one . I,m informed by an employee of Anglia Water. that the new developments do use 6 inch pipework but as soon as that pipework reaches the main sewer it has to join the 3 inch network and actually exacerbates the existing problem .		No	Not Answered	Not Answered		Traffic Infrastructure Flooding on Canvey	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 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. Infrastructure	N

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											Floods . On West Canvey when they created the new cemetery the water table was so high it was difficult to inter the coffins and installation of gravestones impossible. Constructing new industrial units there sounds good on paper but has a survey been carried out to assess the extra cost and increased insurance premiums to operate within this area. I understand why this area is appealing to build on but who is going to set up there. By building on Charfleets and Manor Trading estate where will the current employees find employment. Or are they just expected to claim benefits, increasing my council taxes. Law and Order We are currently being protected by cardboard policemen lurking inside shops. I have not seen actual policeman patrolling for years. This has enabled the creation of youth gangs to destroy buildings, painting walls, chop down trees and generally destroying their environment, this will only get worse . Since the last influx of people onto Canvey has resulted in people														Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flooding 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 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,	

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											wandering around with apparently nothing to do.							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.	

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1011-0001	Individual	Laurel	Harding		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, it doesn't meet the housing target for Castle Point and the site selection ignores Greenbelt/Greybelt 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/Greybelt 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, puts the	Add North West Thundersley site, 187 Ha, as a Greenbelt, Greybelt, 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 Answered	Not Answered		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, needing planning objections 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 Greybelt first. Any development on this site affects 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	
1440-0007	Organisation	Joe seph	Beale	RSPB	Yes	C5	Yes		No	Justified, Consistent with national policy	Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance	Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species, designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and	No				Any discussions on improving routes on and off Canvey must involve RSPB and other stakeholder eNGOs at an early stage, and will need to look into ensuring minimal impacts on priority habitats, LNRS Priority Species,	See modifications proposed	2. This will be prepared in collaboration with key partners including ECC, adjoining district and

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											and other impacts, and flyway routes	other impacts, and flyway routes. Any new infrastructure must not be detrimental to this important and biodiverse are, particularly to designated sites, including Holehaven Creek SSSI and Canvey Wick SSSI, as well as to west Canvey Marsh RSPB reserve.					designated sites, functionally linked land, habitat connectivity, pollution, construction and operational disturbance and other impacts, and flyway routes		unitary councils , Transport East, Natural England , Environment Agency , Government departments such as the DfT, BEIS and MHCLG and relevant agencies as well as engagement with the local community. 4. Options in the feasibility study for improvements to access to Canvey Island

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																			must seek to minimise environmental impacts and will be subject to Habitats Regulations Assessment to ensure there is no adverse effect on integrity resulting harm to internationally protected sites.
1440-0008	Organisation	Joe seph	Beale	RSPB	Yes	C6	Yes		No	Justified, Consistent with national policy	There is no provision for well designed dog walking park in the area. This will take the pressure of the more sensitive sites and already pressured at West Canvey Marshes and Canvey Wick SSSI. There is also the opportunity to implement flower-rich and low-nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS habitat and Priority Species measures.	Add a sentence about creation of a well-designed dog-walking green space in the area. Add a sentence about the opportunity to implement flower-rich and low-nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS.	No				There is no provision for well designed dog walking park in the area. This will take the pressure of the more sensitive sites and already pressured at West Canvey Marshes and Canvey Wick SSSI. There is also the opportunity to implement flower-rich and low-	Policy C6(5) already allows for opportunities to develop habitats for priority species, stating ' <i>Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic</i>	8.56 Whilst most forms of development cannot take place in this area due to the constraints around the port

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											It is nonetheless good to see the Essex LNRS embedded in this and other Policies.						nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS habitat and Priority Species measures. It is nonetheless good to see the Essex LNRS embedded in this and other Policies. Add a sentence about creation of a well-designed dog-walking green space in the area. Add a sentence about the opportunity to implement flower-rich and low-nutrient pollinator corridors and Nightingale scrub corridors, as per the Essex LNRS.	<i>Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).'</i> Nonetheless, mods could be included to further address the points about recreational routes, noting that land ownerships may be a constraint.	facilities , this is an area where further enhancement of ecology through biodiversity net gain or through long term schemes such as Countryside Stewardship would be encouraged by the Council. The Green and Blue Infrastructure Strategy identifies a long-term opportunity to establish a Country Park at the

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																			Green Lung and through this, there may be the possibility to establish a well-designed dog-walking green space in the area.
1440-0009	Organisation	Joseph	Beale	RSPB	Yes	B9	Yes		No	Justified	There are several positive points in this Policy, such as increased biodiversity and wildlife corridors. However, there is a risk of 'species rich' grassland that will be used, and nutrient-enriched, by dogs more than wildlife, or general non-native shrub planting. Given the importance of South Benfleet as an area with potential to provide connectivity following the principles of the Essex LNRS, it could be explained in Policy how these aims will be achieved whilst subject to recreational pressures.	It should be clarified how native scrub and low-nutrient grassland corridors will be enhanced or created, and how this can realistically function alongside areas with high densities of dogs. If this can be done, there is an excellent opportunity to enhance connectivity and biodiversity in this area. Paragraph b.36 is welcome. To increase flood storage, Castle Point can create ponds in existing low points on the site and connect with long grassland buffer zones.	No				There are several positive points in this Policy, such as increased biodiversity and wildlife corridors. However, there is a risk of 'species rich' grassland that will be used, and nutrient-enriched, by dogs more than wildlife, or general non-native shrub planting. Given the importance of South Benfleet as an area with potential to provide connectivity following the principles of the Essex LNRS, it could be explained in Policy how these	More detailed matters of site managementt can be drawn out in the master plan. Point 3 of Policy B9 already addresses flood storage <i>It should be clarified how native scrub and low-nutrient grassland corridors will be enhanced or created, and how this can realistically function alongside areas with high densities of dogs. If this can</i>	N

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																	aims will be achieved whilst subject to recreational pressures. It should be clarified how native scrub and low-nutrient grassland corridors will be enhanced or created, and how this can realistically function alongside areas with high densities of dogs. If this can be done, there is an excellent opportunity to enhance connectivity and biodiversity in this area. Paragraph b.36 is welcome. To increase flood storage, Castle Point can create ponds in existing low points on the site and connect with long grassland buffer zones.	<i>be done, there is an excellent opportunity to enhance connectivity and biodiversity in this area. Paragraph b.36 is welcome. To increase flood storage, Castle Point can create ponds in existing low points on the site and connect with long grassland buffer zones.'</i>	
1440-0010	Organisation	Joseph	Beale	RSPB	Yes	B8	Yes		No	Justified	We suggest more detail can be provided around urban biodiversity enhancements.	Policy B8 can be improved by including: Brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this;	No				Suggest more detail can be provided around urban biodiversity enhancements. Policy B8 can be improved by including: Brownfield habitat within the	More detailed matters of site managementt can be drawn out in the master plan. Swift boxes already covered by Policy ENV5	N

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												Small additions; Swift boxes, sandy flower beds with well though through planting for pollinators, some green roofs on large retails units, increased tree and shrub cover where appropriate; The Beth Chatto housing estate can be used as a possible model – dry gardens with planting of native (and potentially non-native) plants.					development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this; Small additions; Swift boxes, sandy flower beds with well though through planting for pollinators, some green roofs on large retails units, increased tree and shrub cover where appropriate; The Beth Chatto housing estate can be used as a possible model – dry gardens with planting of native (and potentially non-native) plants.		
1440-0011	Organisation	Joseph	Beale	RSPB	Yes	C3	Yes		No	Justified	Currently this Policy does not factor in features that will support increased biodiversity, in particular scarce and rare invertebrates, nor the risk of any recreational disturbance in the case of redevelopment of the port (Paragraph 8.31).	Any redevelopment of the port should factor in features that will support increased biodiversity in particular scarce and rare invertebrates, to align with Essex LNRS aims and the Thames Estuary North Important Invertebrate Area. This can be done by taking the opportunity to include brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, use of	No				Currently this Policy does not factor in features that will support increased biodiversity, in particular scarce and rare invertebrates, nor the risk of any recreational disturbance in the case of redevelopment of the port (Paragraph	Part a of the existing policy states 'The design of the proposed development must not cause significant harm to the landscape or environmental assets, having regard to the scale of existing development on	N

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												waste material such as crushed concrete in gabion baskets are examples of this, and buffer zones of low-nutrient substrates and scrub. The potential mitigation for any recreational disturbance should feature in Section 8.31 in the case of redevelopment of the port.					8.31). Any redevelopment of the port should factor in features that will support increased biodiversity in particular scarce and rare invertebrates, to align with Essex LNRS aims and the Thames Estuary North Important Invertebrate Area. This can be done by taking the opportunity to include brownfield habitat within the development; green roofs, sandy planted areas/sandbanks, use of waste material such as crushed concrete in gabion baskets are examples of this, and buffer zones of low-nutrient substrates and scrub. The potential mitigation for any recreational disturbance should feature in Section 8.31 in the case of redevelopment of the port.	the site;' Part e notes the imporantnce of compliance with ENV3 which covers recreational disturtbance to international sites and biodiversity net gain (although all policies in the Plan should be read as a whole).	

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1440-0012	Organisation	Joe seph	Beale	RSPB	Yes	SP3	Yes		No	Justified	Brownfield land needs to be clarified here and elsewhere in the Local Plan, to make it explicit that it is non-biodiverse brownfield land that will be targeted for development. Brownfield sites within Castle Point such as Canvey Wick SSSI and parts of the wider Thames Estuary North Important Invertebrate Area illustrate how biodiverse soem brownfield land can be, and Policy must be clear that such areas are not under threat of development, but rather only the species-poor brownfield sites. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example: 6.6, Urban p.136: brownfield sites — ‘disused developed land’ can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates. Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor	To slightly amend wording in this Policy, such as 3a and Paragraph 6.34, to clarify "non-biodiverse" brownfield land is the focus for development. Also to amend wording accordingly throughout the Local Plan document.	No				Brownfield land needs to be clarified here and elsewhere in the Local Plan, to make it explicit that it is non-biodiverse brownfield land that will be targeted for development. Brownfield sites within Castle Point such as Canvey Wick SSSI and parts of the wider Thames Estuary North Important Invertebrate Area illustrate how biodiverse soem brownfield land can be, and Policy must be clear that such areas are not under threat of development, but rather only the species-poor brownfield sites. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example: 6.6, Urban p.136: brownfield sites — ‘disused developed land’ can serve as both a valuable wild space for	Noted	N

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											biodiversity on brownfield sites as they can often become important habitats for invertebrates and early successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' And in addition, 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).'						nearby communities and a refuge for a variety of priority invertebrates. Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' And in addition, 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often		

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																	an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).' To slightly amend wording in this Policy, such as 3a and Paragraph 6.34, to clarify "non-biodiverse" brownfield land is the focus for development. Also to amend wording accordingly throughout the Local Plan document.		
1440-0013	Organisation	Joe seph	Beale	RSPB	Yes	Had 2	Yes		No	Not Stated	Policy Had2 – This Policy is welcome, but there needs to be a consideration for minimising recreational disturbance on priority/sensitive habitats. there is the opportunity to implement pollinator and Nightingale corridors, via scrub and flower-rich grassland.	This Policy is encouraging and there is much that is positive, but there needs to be Policy consideration for mitigating recreational disturbance on priority/sensitive habitats.	No				Policy Had2 – This Policy is welcome, but there needs to be a consideration for minimising recreational disturbance on priority/sensitive habitats. there is the opportunity to implement pollinator and Nightingale corridors, via scrub and flower-rich grassland. This Policy is encouraging and there is much that is positive, but there needs to be	Conserving and enhancing the network of priority habitats is covered by ENV3c. The plan policies need to be read as a whole.	N

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																	Policy consideration for mitigating recreational disturbance on priority/sensitive habitats.		
1440-0014	Organisation	Joe seph	Beal e	RSPB	Yes	ENV 5	Yes		No	Justified	Policy ENV5 – We welcome the inclusion of Swift bricks in Point 1. Swift bricks or boxes can be in clusters of >3 as they are a communal species, where practical to do so. Larger industrial or commercial units should be expected to contribute more boxes overall than smaller residential developments. There also needs to be Policy around renovation work to ensure no loss of nest sites. Point 2 needs a clause added to exempt conservation fencing - such as the RSPB putting up a predator exclusion fence on our West Canvey reserve. Point 3. Low/no lighting needs to be considered on or around sites of high invertebrate/nature value.	Point 1: wording to be added to account for the disparity in contribution possible for commercial and larger developments. Suggested changes: Wording to clarify for Minor Developments, classed as up to 9 residential units or less than 1,000 square metres of commercial floorspace, the minimum number of swift bricks (or boxes) needed is: • residential developments - three bricks, or two per dwelling, whichever is the greater. • commercial developments - three bricks, or one per 50 square metres of floorspace, whichever is the greater. Major developments, classed as 10+ residential units or 1,000 square metres or more of commercial floorspace. For major developments the County Ecologist will recommend specific requirements. We recommend adding wording such as: "renovations and refurbishments must not result in loss of nest sites, and any losses should be replaced on a	No				Policy ENV5 – We welcome the inclusion of Swift bricks in Point 1. Swift bricks or boxes can be in clusters of >3 as they are a communal species, where practical to do so. Larger industrial or commercial units should be expected to contribute more boxes overall than smaller residential developments. There also needs to be Policy around renovation work to ensure no loss of nest sites. Point 2 needs a clause added to exempt conservation fencing - such as the RSPB putting up a predator exclusion fence on our West Canvey reserve. Point 3. Low/no lighting needs to be considered on or around sites of high	This policy specifically addresses the three species identified in NPPF para 187(d). Mods proposed.	Addition to Supporting text 18.42 and the Council's commitment to nature conservation, local policy has addressed this issue. The policy stipulates an average of at least one Swift brick/box per dwelling /unit, so where practical to do

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												like-for-like basis." Recommend Swift boxes be in clusters of >3 where practical to do so, as they are a communal species. Point 2: add a clause such as: "with exemptions for conservation fencing where appropriate". This would help the RSPB or other conservation organisations, for example when putting up a predator exclusion fence on our West Canvey reserve. Point 3. Suggest adding the wording: "There should be consideration of low or zero lighting around sites of high invertebrate/nature value, reflecting the substantial body of evidence around the impacts of artificial lighting on invertebrates. In addition, in relation to Point 3, reference to the invertebrate interest on Canvey/in Castle Point and its importance in providing valuable ecosystem services (pollination, crop production, waste disposal, soil health, etc) could be included somewhere in this Policy. Also for the importance of coastal grazing marsh as a habitat for its flood storage benefits and unique ecology.					invertebrate/nature value.		so they can be in clusters of greater than 3, since Swifts are a communal species. 18.43 The hedgehog is now officially National Hedgehog Conservation Strategy , published in October 2024. 'Conservation' fencing, such as predator exclusion fences installed on reserves by conserv

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																			ation organisations, may be exempt from the requirement, as appropriate
1440-0015	Organisation	Joe seph	Beale	RSPB	Yes	Infr a4	Yes		No	Justified	While there are some good aspects to this Policy, specific dog walking open spaces/areas should be mentioned here. One third of British households have one or more dogs, yet there is no specific provision in the Policy. There is also another excellent opportunity to implement pollinator and Nightingale corridors, following Essex LNRS principles, via scrub and flower-rich grassland.	There should be a reference added regarding the creation of specific dog walking open spaces, to be located away from the more sensitive sites and from more sensitive areas of new habitat creation. There is the opportunity to implement pollinator and Nightingale corridors, via scrub and flower-rich, low-nutrient grassland, that can be specified in this Policy.	No				While there are some good aspects to this Policy, specific dog walking open spaces/areas should be mentioned here. One third of British households have one or more dogs, yet there is no specific provision in the Policy. There is also another excellent opportunity to implement pollinator and Nightingale corridors, following Essex LNRS principles, via scrub and flower-rich grassland.	Para 19.52 shows that a significant proportion of the open space will be accessible natural greenspace which will be designd according to site and local circumstances.	N

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1440-0016	Organisation	Joe	Beale	RSPB	Yes	SD1	Yes		No	Justified	Given the great importance of the Essex Coast to birds, and other wildlife, including as part of the East Atlantic Flyway, the use of Beneficial Use of Dredged Sediment (BUDS) should be included in this section as an alternative to hard sea defences where possible. BUDS could also be used to protect and enhance existing coastal habitat such as saltmarsh as they have done in the Blackwater Estuary. Recharging Canvey Point would be an option. Even offshore recharges could be an option to reduce the impact of tidal surges. These islands would simultaneously deliver for nature conservation as breeding/roosting islands for shorebirds. Page 172. There should be mention of working with the EA to understand/ensure the future of the two tidal flood barriers at Benfleet and East Haven Creeks, which are vital protection for the island.	Given the great importance of the Essex Coast to birds, and other wildlife, including as part of the East Atlantic Flyway, Beneficial Use of Dredged Sediment (BUDS) should be mentioned in this Policy as an alternative to hard sea defences where possible. BUDS could also be mentioned as an option to protect and enhance existing coastal habitat such as saltmarsh, as they have done in the Blackwater Estuary, with recharging and offshore recharging options to consider. Page 172. There should be mention of working with the EA to understand/ensure the future of the two tidal flood barriers at Benfleet and East Haven Creeks. These are vital protection for the island, yet not mentioned specifically	No				Given the great importance of the Essex Coast to birds, and other wildlife, including as part of the East Atlantic Flyway, the use of Beneficial Use of Dredged Sediment (BUDS) should be included in this section as an alternative to hard sea defences where possible. BUDS could also be used to protect and enhance existing coastal habitat such as saltmarsh as they have done in the Blackwater Estuary. Recharging Canvey Point would be an option. Even offshore recharges could be an option to reduce the impact of tidal surges. These islands would simultaneously deliver for nature conservation as breeding/roosting islands for shorebirds. Page 172. There should be mention of working with the EA to understand/ensure the future of the	Noted	N

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																	two tidal flood barriers at Benfleet and East Haven Creeks, which are vital protection for the island.		
1440-0017	Organisation	Joe Seph	Beale	RSPB	Yes	SD7	Yes		No	Justified	Contaminated land can be biodiverse brownfield habitat, and can have good floral diversity and invertebrate interest. In addition to broader environmental or pollution hazards, this fact should be acknowledged in this Policy. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example, 6.6, Urban p.136: brownfield sites — ‘disused developed land’ can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates. Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats	Add a new sentence to clarify that contaminated sites can be biodiverse brownfield habitat. For example: "Where a site is contaminated the Council will not permit development if it of biodiversity value."	No				Contaminated land can be biodiverse brownfield habitat, and can have good floral diversity and invertebrate interest. In addition to broader environmental or pollution hazards, this fact should be acknowledged in this Policy. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example, 6.6, Urban p.136: brownfield sites — ‘disused developed land’ can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates. Also 14. Understand	Noted	N

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											for invertebrates and early successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' Also: 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).'						existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' Also: 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land		

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																	(brownfield).' Add a new sentence to clarify that contaminated sites can be biodiverse brownfield habitat. For example: "Where a site is contaminated the Council will not permit development if it of biodiversity value."		
1440-0018	Organisation	Joe Seph	Beale	RSPB	Yes	ENV 2	Yes		No	Justified	The RSPB welcomes e) enhancing networks , and the mention of the Essex LNRS guidelines and APIBs. Recreational disturbance needs to feature in this Policy. Policy needs to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA. There is the option to explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example saline lagoon creation. Enhancing coastal areas for biodiversity should be specified.	Policy ENV2 should specify the need to address recreational disturbance and to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA. It is suggested to add wording such as: "Explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example through saline lagoon creation. Policy should specifically include reference to enhancing coastal areas for biodiversity.	No				The RSPB welcomes e) enhancing networks , and the mention of the Essex LNRS guidelines and APIBs. Recreational disturbance needs to feature in this Policy. Policy needs to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA. There is the option to explore opportunities for coastal adaptation measures and Beneficial Use of	Recreational disturbance and RAMS is covered in policy ENV3. Policy ENV2 parts 5 and 6 cover biodiversity, please see proposed mods	6. 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), and priority

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																	Dredged Sediment (BUDS), for example saline lagoon creation. Enhancing coastal areas for biodiversity should be specified. Policy ENV2 should specify the need to address recreational disturbance and to ensure that any organised activities that have the potential to damage or disturb the designated features of the SPA/RAMSAR/SSSI are mitigated for and covered by an HRA. It is suggested to add wording such as: "Explore opportunities for coastal adaptation measures and Beneficial Use of Dredged Sediment (BUDS), for example through saline lagoon creation. Policy should specifically include reference to enhancing coastal areas for biodiversity.		habitats such as coastal floodplain in grazing marsh, mudflats and coastal saltmarsh are protected and where possible enhanced. 7. Proposals for flood defence improvements should seek to deliver biodiversity benefits alongside flood protection.

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1440-0019	Organisation	Joe seph	Beale	RSPB	Yes	ENV 3	Yes		Yes		We welcome this Policy.	We welcome this Policy. We suggest that the possible development of a biodiversity enhancement toolkit for developments could prove useful.	No				We welcome this Policy. We suggest that the possible development of a biodiversity enhancement toolkit for developments could prove useful.	Noted	N
1440-0020	Organisation	Joe seph	Beale	RSPB	Yes	GB2	Yes		No	Justified	Our comment on Policy GB2 is around the need to clarify that biodiverse brownfield and open mosaic habitat on previously developed land is exempt. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example, 6.6, Urban p.136: brownfield sites — ‘disused developed land’ can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates. Also 14. Understand existing local habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early	A sentence needs to be added to Policy GB2 to clarify that biodiverse brownfield and open mosaic habitat on previously developed land will not be considered appropriate for new development.	No				Our comment on Policy GB2 is around the need to clarify that biodiverse brownfield and open mosaic habitat on previously developed land is exempt. The Essex LNRS mentions repeatedly the potential for brownfield sites to be biodiverse and hold scarce species. For example, 6.6, Urban p.136: brownfield sites — ‘disused developed land’ can serve as both a valuable wild space for nearby communities and a refuge for a variety of priority invertebrates. Also 14. Understand existing local	2018 Green Belt Assessments still form part of the evidence and considered wider areas.	N

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											successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' Also: 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).'						habitats and species, p.140: 'Assess the existing biodiversity and connectivity of areas under your management as an important first step to creating new spaces for wildlife and protecting the wider environment. Monitor biodiversity on brownfield sites as they can often become important habitats for invertebrates and early successional communities.' Also, Priority Species – Shrill Carder Bee, p.194: 'Manage and protect brownfield sites, and maintain mosaic of habitats within them by rotational clearance of vegetation.' Also: 8.2 Grassland and Meadows, p.202: 'Flower-rich grassland is often an important component of open mosaic habitats, such as those found on aggregates sites and previously developed land (brownfield).'		

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																	A sentence needs to be added to Policy GB2 to clarify that biodiverse brownfield and open mosaic habitat on previously developed land will not be considered appropriate for new development.		
1440-0021	Organisation	Joe seph	Beale	RSPB	Yes	SD4	Yes		Yes		There are several good parts to this Policy. It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native) plants, could be referenced.	It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native) plants, could be referenced.	No				There are several good parts to this Policy. It is suggested to use recycled materials as soil substrate with drought tolerant beds and planting. A mention of pollen and nectar rich plants and shrubs (pollinator planting) would be a welcome addition. The Beth Chatto housing estate model – dry gardens with planting of native (and potentially non-native) plants, could be referenced.	Noted	N
1440-0022	Organisation	Joe seph	Beale	RSPB	Yes	E1	Yes		No	Justified	These sites could have extensive provision to accommodate brownfield habitat enhancements that will improve these large sites for biodiversity and reduce management costs.	We suggest adding provision for brownfield habitat enhancements across the sites. For example, adding to 2d) to read: "Provide brownfield habitat enhancements, and	No				These sites could have extensive provision to accommodate brownfield habitat enhancements that will improve these	Noted	N

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												environmental improvements such as to the quality of open spaces, landscaping, roads, drains, and communication infrastructure;					large sites for biodiversity and reduce management costs.		
1440-0023	Organisation	Joe seph	Beale	RSPB	Yes	SP2	Yes		No	Justified	It is important that brownfield are also identified as sites of potential high biodiversity (as per the Essex LNRS) and that development on such land should feature brownfield features such as mixed aggregates and green roofs and walls. Such development design can also lead to improved well-being in places of residents and work. Policy SP2 does not indicate that habitats and biodiversity will factor into development design.	Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land should feature brownfield features such as mixed aggregates and green roofs and walls. Such development design can also lead to improved well-being in places of residents and work. Policy SP2 should indicate that habitats and biodiversity will factor into development design.	No				Brownfield should be identified as potentially being high biodiversity (as per the Essex LNRS). Development on such land should feature brownfield features such as mixed aggregates and green roofs and walls. Such development design can also lead to improved well-being in places of residents and work. Policy SP2 should indicate that habitats and biodiversity will factor into development design.	Noted	N

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1440-0024	Organisation	Joe	Beale	RSPB	Yes	SP1	Yes		No	Justified	This Policy has many welcome parts. However, small tweaks in Policy could see nature easily woven into the development policies as 'nature enhancements' that would make a big difference in total. The urban-first approach to development is welcome, as is the emphasis on corridors and connectivity, and the embedding of the Essex Local Nature Recovery Scheme (LNRS) throughout the document. There is a need for an additional objective or clarity around how nature fits with the vision and the objectives. There is no mention of the RAMS strategy or protection of sensitive sites from recreational disturbance. 6.9 - in the first sentence there is a typo: 'requirement' is missing the letter t. Section 6.13. there is mention of recreational impact of residents on protected sites but no mention of mitigation or the RAMS strategy. There is no mention of ensuring habitat quality. Page 21map - the key is confusing with regards to ancient woodland shown on the map. It would also be useful to have habitat quality shown on this map, or whether a site is in	Small additions throughout could be added to Policy to include: Swift boxes/bricks, sandy flower beds with well thought through planting for pollinators, some green roofs on large retail units, increased tree and shrub cover where appropriate, and well designed SUDS/pond/water storage features; together these measures would make a big difference. Another addition to this Policy could be improved roadside verge management, similar to that on Roscommon Way, to improve connectivity for invertebrates as per the LNRS aims. There is a need for an additional objective or clarity around how nature fits with the vision and the objectives. There should be mention of the RAMS strategy or protection of sensitive sites from recreational disturbance. 6.9 - the first sentence has a typo: 'requirement' is missing the letter t. Section 6.13. There should be mention of mitigation or the RAMS strategy. There should be mention of ensuring good habitat quality. Page 21 map - the key is confusing with regards to ancient woodland. The	No				This Policy has many welcome parts. However, small tweaks in Policy could see nature easily woven into the development policies as 'nature enhancements' that would make a big difference in total. The urban-first approach to development is welcome, as is the emphasis on corridors and connectivity, and the embedding of the Essex Local Nature Recovery Scheme (LNRS) throughout the document. There is a need for an additional objective or clarity around how nature fits with the vision and the objectives. There is no mention of the RAMS strategy or protection of sensitive sites from recreational disturbance. 6.9 - in the first sentence there is a typo: 'requirement' is missing the letter t. Section 6.13. there	Noted. Recreational disturbance and RAMS is covered in policy ENV3.	Y - Typo in 6.9 corrected. Map on page 21 to be corrected

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											or out of management. Brownfield as potentially biodiverse land could be mentioned.	hatching needs to be consistent with what is shown on the map. It would also be useful to have habitat quality shown on this map, or whether a site is in or out of management. Mention should be made that if a brownfield location is assessed as rich in biodiversity, it should be avoided or appropriate mitigation undertaken, such as green roofs varied substrates in landscaping.					is mention of recreational impact of residents on protected sites but no mention of mitigation or the RAMS strategy. There is no mention of ensuring habitat quality. Page 21map - the key is confusing with regards to ancient woodland shown on the map. It would also be useful to have habitat quality shown on this map, or whether a site is in or out of management. Brownfield as potentially biodiverse land could be mentioned.		
1440-0025	Organisation	Joseph	Beale	RSPB	Yes	Thun4	Yes		Yes		Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale corridors through creation of scrub and flower-rich/low-nutrient grassland.	Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale corridors through creation of scrub and flower-rich/low-nutrient grassland.	No				Some thought needs to be given to the recreational impact on the grasslands and SN Ancient Woodlands. Dogs and mountain bikes are a considerable issue in the woodlands some of which are SSSIs. There is opportunity here to implement pollinator and Nightingale	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
																	corridors through creation of scrub and flower-rich/low-nutrient grassland.		
0271-0001	Organisation	Stephen	Travis	S&S Vehicle Services	Yes	B8	No		No	Not Stated	We are a local business on the Manor Trading Estate and have had a presence on the estate for years. 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. I record that S&S Vehicle Services agree with G&K Groundworks Ltd.'s in that the regulation 19 draft as presented is Unsound. As relayed in G&K Groundworks Ltd submission 1. CPBC have never engaged with us at S&S about our future of this estate. 2. Have never informed us, as is on the council's regeneration web page at priority Nr 4 that CPBC intends to build houses on the Manor Trading Estate and move all the businesses on the MTE North of the Borough 3. I presume CPBC intends to Compulsorily purchase my operational property! Again, I have not been consulted at all this is very worrying and concerning. We are certainly more		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 Manor Trading 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 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	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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											confused now! Where are we going to be re-homed? This Reg 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. Perhaps CPBC might remove that Regeneration Priority Frightening Statement and actually support the local business.						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 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		

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																	• 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! Questions over consistency with		

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																	CPBC Regeneration policies		
0354-0001	Organisation	Mark	Sheppard	Southend City Council		SP3	Yes	In relation to the strategic position of Castle Point within South Essex, we support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport, employment, education and skills, and environmental assets. Leigh Port could be added to the diagram to recognise its economic and tourism role for the South Essex economy. The vision and objectives as proposed are also supported. Southend-on-Sea City Council will continue to work together with Castle Point Borough Council to further the objectives related to these cross-boundary issues. Policy SP3 states that the Castle Point Plan will	No	Not Stated	Southend-on-Sea City Council will be updating its Green Belt study to reflect the National Planning Policy Framework 2024 and will engage with you and with Rochford District Council as neighbouring Green Belt authorities in relation to the study methodology. As you will be aware, Southend-on-Sea City Council is currently consulting on its Local Plan – Preferred Approach with Options document at Regulation 18. This includes draft policies and potential site allocations. Evidence indicates that even if all the potential sites that have been promoted for development in Southend were to be carried forward as site allocations, Southend would be unable					A	An objection is raised in relation to ‘soundness’ of the Plan due to the failure to meet identified housing need, and importantly lack of robust evidence for this shortfall and justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its housing need in full or ‘closed the gap’. The not insignificant constraints in relation to flood	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	N

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								deliver a minimum of 6,196 new homes over the period 2026 to 2043. The starting point for assessing housing need is the standard methodology set by the Government, which equates to 11,662 dwellings over the plan period for the Borough of Castle Point. The housing supply in SP3 is clearly a significant shortfall against the government's standard method. The draft plan notes at paragraph 6.41 that a forensic review of potential urban capacity has been undertaken. The not insignificant constraints in relation to flood risk and international and national biodiversity designations are also recognised. There is also a significant proportion of land designated as metropolitan green belt within the Borough. Regarding brownfield development and urban regeneration - we are keen to work with you to develop a consistent approach to the optimisation of site densities where applicable, taking into account local character and context (for example the A13 London Road, which has seen intensification in recent years, forms a continuous transport link between the authorities). We would			to meet its housing need in full using the Government's new Standard Method. This remains the case even if a sizeable windfall allowance could be demonstrated over the plan period. Unmet housing needs deriving from Southend is estimated to be between 10,000 to 14,000 dwellings to 2040. Furthermore, as you are aware, Southend also has a number of physical constraints in addition to being predominantly a built-up urban area with coastline to the south and east (and associated environmental designations), it also has a relatively small amount of undeveloped land, which forms part of the Metropolitan Green Belt. As such, we reiterate for the purposes of this consultation that Southend-on-Sea City Council is unable to accommodate any of Castle Point's unmet housing need. However, we will of course continue to engage positively with you as both respective local plans are progressed. We have written to you separately requesting whether CPBC can assist in meeting any of the housing need deriving from Southend. The potential lower end of Southend unmet needs to						risk and international and national biodiversity designations are also recognised. There is also a significant proportion of land designated as metropolitan green belt within the Borough. The submission Local Plan should set out clearly the rationale for the spatial strategy proposed, including the consideration and rejection of all sites being promoted, and the assumptions built into urban site densities. The spatial strategy as set out in this Regulation 19 consultation does not seek to allocate Green Belt sites. Justification includes a focus on impacts on the existing transport network, potential impact on heritage assets, and physical/ market capacity, amongst others. The Castle Point Green Belt	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. Within the NPPF Paragraph 11 section b (i) and (ii) give an acknowledgement of circumstances in which national policy does not expect Standard Method outcomes to be met in full. This includes situations where: the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of	

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								welcome further dialogue in relation to future plans for Hadleigh Town Centre which could have impacts on traffic movements into/ out of Southend. The submission Local Plan should set out clearly the rationale for the spatial strategy proposed, including the consideration and rejection of all sites being promoted, and the assumptions built into urban site densities. It is noted that the previous version of the Castle Point Local Plan that was found sound at examination, but not subsequently adopted, considered a number of green belt sites for potential allocation, to contribute towards housing need in the Borough. However, the spatial strategy as set out in this Regulation 19 consultation does not seek to allocate Green Belt sites. Justification includes a focus on impacts on the existing transport network, potential impact on heritage assets, and physical/ market capacity, amongst others. The Castle Point Green Belt Assessment (2025), it is noted, provides a finer grain assessment of green belt and has identified a number of sub areas of potential grey belt within the Borough, with Policy GB2			2040 (10,000 homes) includes all sites promoted to the local plan and a sizeable windfall allowance. This is not the case for CPBC Local Plan where a number of sites have been discounted in the Regulation 19 version of the plan. Given the significant sub-regional housing pressure and potential scale of unmet needs there should be strong and evidenced reasons as to why development is being restricted and potential development sites not included within the CPBC Local Plan. Ultimately, CPBC should be confident it is submitting a ‘sound’ plan where omission sites can be robustly justified at examination. Given the above, an objection is raised in relation to ‘soundness’ of the CPBC local plan due to the failure to meet identified housing need, and importantly lack of robust evidence for this shortfall and justification for the dismissal of alternative spatial strategy options and previously considered Green Belt development sites that might have enabled the Borough to meet its housing need in full or ‘closed the gap’. We would welcome						Assessment (2025), it is noted, provides a finer grain assessment of green belt and has identified a number of sub areas of potential grey belt within the Borough, with Policy GB2 setting out the approach to managing previously developed land in the green belt. Note the NPPF guidelines for Green Belts Support omission of GB8 Land South of Hadleigh.	development in the plan area 7 ; or • any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. Footnote 7 clarifies this position by providing a list of constraints. Green Belt is, prominently, among these, as is flooding. Paragraph: 002 Reference ID: 3-002-20190722 of the PPG advises that “Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations...” The NPPF footnotes set out the areas where the Framework	

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								setting out the approach to managing previously developed land in the green belt. Green Belt land should only be identified for release following a Green Belt review and where exceptional circumstances are fully evidenced and justified as per the National Planning Policy Framework (NPPF). As you are aware paragraph 146 of the NPPF states ‘Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan’. We previously objected (in September 2024) to the inclusion within the Regulation 18 Issues and Options consultation of site GB8 Land South of Hadleigh. This land has a			the opportunity engage further with CPBC on this issue and to produce an agreed Statement of Common Ground between Southend-on-Sea and Castle Point Councils regarding plan making, to set out areas of agreement.								would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas).” 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	

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								historical context and visually and functionally performs strongly in serving a Green Belt purpose of separating the two settlements of Southend and Hadleigh. This function would likely be significantly eroded by the partial or complete release of GB8 from the Green Belt. The omission of this site from the current consultation is therefore supported.										the Green Belt Assessment July 2025, were reviewed. However, none were considered suitable for development as outlined in the Housing Capacity Topic Paper August 2025.	
0354-0002	Organisation	Mark	Sheppard	Southend City Council		SP4	Not Stated	We will continue to work collaboratively with you in developing our respective Infrastructure Delivery Plans as there are many areas including transport, health, education, utilities and community facilities where our residents access services across administrative boundaries. We would welcome further dialogue in terms of transport planning.	Not Stated	Not Stated	The policies for biodiversity and landscape are supported. We will continue to work with you to develop a Riverside Approach within our respective local plans that recognises the importance of the environmental, social, cultural and economic role of the Thames Estuary foreshore and how it can best adapt to a changing climate.					A	SCC will continue to work collaboratively with CPBC in developing our respective Infrastructure Delivery Plans as there are many areas including transport, health, education, utilities and community facilities where our residents access services across administrative boundaries. Would welcome further dialogue in terms of transport planning. The policies for biodiversity and landscape are	Noted	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
																	supported. We will continue to work with you to develop a Riverside Approach within our respective local plans that recognises the importance of the environmental, social, cultural and economic role of the Thames Estuary foreshore and how it can best adapt to a changing climate.		
0354-0003	Organisat ion	Mar k	She ppar d	Sout hend City Coun cil		SD1	Yes	The London Fenchurch Street to Shoeburness railway line is a key transport route for Southend residents to access jobs and leisure opportunities. We will continue to work in collaboration with Castle Point Borough Council, the Environment Agency and transport agencies to manage flood risk and build in long-term resilience for the railway line.	Ye s							A	The London Fenchurch Street to Shoeburness railway line is a key transport route for Southend residents to access jobs and leisure opportunities. We will continue to work in collaboration with Castle Point Borough Council, the Environment Agency and transport agencies to manage flood risk and build in long-term resilience for the railway line.	Noted	N
0354-0004	Organisat ion	Mar k	She ppar d	Sout hend City Coun cil		Mo nito ring Fra me	Not Sta ted		No t St ate d			Finally, within the proposed Monitoring Framework, we suggest monitoring the percentage of Health Impact Assessments submitted in accordance with relevant				A	Within the proposed Monitoring Framework, we suggest monitoring the percentage of	Mods proposed • • Monitoring Framework Objective 19 – update the monitoring	Y

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						work						application thresholds. An additional indicator is also suggested to monitor the number of new community use agreements (objective 20).					Health Impact Assessments submitted in accordance with relevant application thresholds. An additional indicator is also suggested to monitor the number of new community use agreements (objective 20).	indicator to read as “ ~~submission~~ percentage of health impact assessments submitted for relevant applications ” • Monitoring Framework Objective 20 – additional monitoring indicator included to read as “ number of new community use agreements per year ”	
0354-0005	Organisation	Mark	Sheppard	Southend City Council		For word	Not Stated	In relation to the strategic position of Castle Point within South Essex, we support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport, employment, education and skills, and environmental assets. Leigh Port could be added to the diagram to recognise its economic and tourism role for the South Essex economy. The vision and objectives as proposed are also supported. Southend-on-Sea City Council will continue to work together with Castle Point Borough Council to further the objectives related to these cross-boundary issues.	Not Stated							A	The vision and objectives as proposed are supported. Support highlighting the important inter-connections between Southend-on-Sea and Castle Point in terms of transport, employment, education and skills, and environmental assets. . Request Key diagram is to be updated to include Leigh Port as “Port Facilities”.	Mod proposed: The Strategic Position of Castle Point within South Essex – diagram is to be updated to include Leigh Port as “Port Facilities”.	Y

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0738-0001	Organisation	Roy	Warren	Sport England	Yes	Forword	Yes		Yes		Support is offered for the proposed vision in terms of green spaces, community buildings and other community spaces delivering health and wellbeing outcomes. This vision would accord with Government policy in paragraph 96(c) of the NPPF and Sport England's 'Uniting the Movement' Strategy https://www.sportengland.org/about-us/uniting-movement		Not Answered	Not Answered	Not Answered	A	Support is offered for the proposed vision in terms of green spaces, community buildings and other community spaces delivering health and wellbeing outcomes	Support noted.	N
1014-0001	Individual	Harry	Pyle		Yes	HAD4	No		No			This site will produce a lot more traffic on an already busy route. Also at peak times and school times, the road is often down to one way due to the number of parked cars on dropping off/picking up times	No	Not Answered	Not Answered		Objecting to HAD4 due to traffic concerns	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.	N
1015-0001	Individual	Lilly	Howlett		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1016-	Individual	Emma	Howlett		Yes	Whole	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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0001						Plan							swere d	wered	were d				
1017-0001	Individual	Gar eth	How lett		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1018-0001	Individual	Viv	Bygrave		Yes	C4	Yes	This is a guarded 'yes' as I can only assume Castlepoint Council act in a lawful manner at all times as I have elected them to have this specific knowledge and expertise	No	Positively prepared, Effective, Justified	It should meet the needs of the area, it does not meet the needs of the residents current and future of Canvey island. Who would want to live on Canvey Island when the traffic system is insufficient to allow exit from the island especially at rush hour and times of emergency when traffic is at a standstill maybe for 2 or 3 hours. People need more affordable housing off the island to reduce the substantial pressure on all the services currently available on Canvey which do not meet the needs of many current residents not to mention another over 3000 homes. There is one access/exit roundabout through which ALL traffic must travel to leave or enter the island that cannot cope well at many times of the day for the existing approx 45 000 residents , it can t cope with more traffic. It is a frequent occurrence that the roads are blocked in a gridlock which sometimes reaches far back through	1. To increase the density of homes on Canvey it is crucial to improve infrastructure by upgrading the sewage and rainwater collection systems currently uses 3 inch (not standard 6 inch pipes0 so so it can genuinely cope with the needs of residents on the island . New housing increases a system already under severe strain because the new developments use the larger pipes which have greater flow which then feed into the narrow pipes and create blockages and other problems. Recently where I live two roads have been closed for many weeks where the road collapsed and the sewer had to be rebuilt and then the road restored. 2. Especially with proposals at C4 another exit MUST be provided off the Island, extending and connecting to Stanford Le Hope/Corringham at junction with Thames Gateway and thus to A13 using the part built emergency route at	Not Answered	Not Answered	Not Answered	A	Gas hazards Emergency services Green/Grey Belt Flood risk on canvey Infrastructure Third road onto Canvey	Gas Hazards As set out in Plan paragraph 8.28 'Both port facilities are registered as Control of Major Accident Hazards (COMAH) sites due to the hazardous nature of the goods that they receive and store. The Health and Safety Executive (HSE) and the Environment Agency are responsible for regulating activities at these sites, and also provide advice on the level of hazard the installations pose to nearby development. Both installations have HSE consultation	N

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											the town centre, this may be a simple accident or broken down vehicle as the main roads are single tracked . Even an accident on the A130 or as far away as the Dartford tunnel can cause a standstill of many hours on Canvey and reduce safety on the island. there here have been serious disasters such as the aviation fuel tanker that caught fire at Sadlers farm and mains water bursts at Tarpots that stopped traffic flow for several days on the island. The new retail development at Charfleets has attracted more traffic to the Island sometimes it is difficult to access the roundabout from Waterside as the oncoming traffic has right of way. Building 2000 homes - a huge development- with potentially another 4000 cars will dramatically affect the viability of the Waterside roundabout and further impede the traffic trying to exit the Island From Somnes Ave. There is no provision for the numerous childcare places that will be needed. Currently childcare is being offered in converted shops and offices with little or no space for the children to have outdoor play which is crucial to their learning because of the lack of	Charfleets past the new cemetery would be an appropriate solution. 3. To fully consider the needs of the proposed homes and the residents . The plan says infrastructure ahs been considered but no details are specified and thus it is unsound. Canvey residents are fed up 'being done to' . We ve fought long and hard for years - against the methane gas storage and the 'creeping gas underground' which persists, the oil and now Calor gas and Aviation fuel, with inadequate overloaded roads so that in an emergency not only is it impossible to get off the island in a timely manner but Emergency services cannot easily access or exit the Island causing further risk to life.								zones identified around them, in which it is expected that other development is controlled to limit unnecessary harm to life and property. The extent of these zones is determined by the nature of the goods received and stored on site, and the technical measures employed to ensure safety at the sites. It is therefore possible that the level of hazard posed to other developments nearby can be reduced, both by limiting development nearby, and also by seeking improvements to the level of hazard posed by these sites, both during normal management and maintenance, and also at the point where new	

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											available land for good quality childcare facilities. There is NO GREEN BELT on Canvey apart from the RSPB sanctuary. The land is already dense with closely built housing with tiny gardens in many instances, outdoor play spaces and leisure areas are already limited and totally inadequate for so much more housing. You can t create leisure spaces when the Island is covered with housing. Whereas off the Island Hadleigh and Benfleet have the luxury of far more green spaces and parks and sport etc so some of their green/grey belt could be used for housing to alleviate the problems of living on Canvey, not exacerbate them. We have no woods on Canvey, maybe Benfleet could do with one less and houses could be built there instead of 2000 crammed into an area prone to flooding and a such a short distance from major industrial dangers such as Calor gas storage and aviation storage and distribution on the limited and busy 'highways'. with a mere retained fire service in case of emergency								development is proposed.’ The current HSE consultation zones are indicated on the policies map. The plan doesn’t propose any new housing allocations in the HSE consultation zone. However, some existing residential areas are already within the zone, as well as the Thorney Bay Park Homes site. Policy SD8 ‘Development near Hazardous Uses’ states that ‘Development proposals will be assessed in accordance with the Health and Safety Executive (HSE) Guidance where they fall within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning	

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																		application will be refused on health and safety grounds’. Emergency services Needs of emergency services considered in the supporting Infrastructure Delivery Plan (IDP). 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	

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																		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 Belt Review	

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																		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. 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 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,	

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																		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 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	

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																		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 the Castle Point Plan will make a contribution to relevant transport improvement projects identified in the Local Transport Plan. Infrastructure Infrastructure matters	

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																		(including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1019-0001	Individual	Denise	Hamplett		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
0738-0002	Organisation	Roy	Warren	Sport England	Yes	Foreword	Yes		Yes		Objectives 2, 3, 17 and 19 are supported as these objectives would support the provision of opportunities for sport/physical activity and encourage active environments. These objectives would be		No	Not Answered		A	Objectives 2, 3, 17 and 19 are supported as these objectives would support the provision of opportunities for sport/physical activity and	Support noted.	N

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											consistent with Sport England's Planning for Sport objectives https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance and Government policy in paragraph 96(c) of the NPPF.						encourage active environments.		
0738-0003	Organisation	Roy	Warren	Sport England	Yes	SP1	Yes		Yes		The policy is supported due to its focus on protecting and enhancing the Borough's green and blue infrastructure to support health and wellbeing including physical activity. The policy would be consistent with Sport England's Planning for Sport objectives https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance and Government policy in paragraph 96(c) and 104 of the NPPF.		No	Not Answered		A	Supports SP1 and the protection and enhancement of GBI to support wellbeing accords with Sport England Planning for Sport guidance and paragraph 96(c) NPPF	Support noted.	N
0738-0004	Organisation	Roy	Warren	Sport England	Yes	SP2	Yes		Yes		The policy is supported, especially part 3 because the requirements would support the creation of active environments that would encourage physical activity through the planning and design of development. The policy would be consistent with Sport England's Active Design guidance		No	Not Answered		A	Supports SP2 and creation of active environments, accords with Sports England Planning for Sport guidance and paragraph 96(c) of NPPF	Support noted.	N

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											https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design and Government policy in paragraph 96(c) and 129 of the NPPF.								
0738-0005	Organisation	Roy	Warren	Sport England	Yes	SP4	Yes		Yes		The policy is supported as it would help ensure that infrastructure requirements arising from development including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. The specific reference in paragraph 6.62 of the reasoned justification to sports facilities as a type of infrastructure that is needed is welcomed in this context. The Council's evidence base including the Playing Pitch Strategy and Built Facilities Strategy would support the inclusion of community sports facility provision as an infrastructure type that is needed to support development and would accord with Government policy in paragraph 103 of the NPPF.		No	Not Answered		A	The policy is supported as it would help ensure that infrastructure requirements arising from development including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. The specific reference in paragraph 6.62 of the reasoned justification to sports facilities as a type of infrastructure that is needed is welcomed in this context	Support noted.	N
0738-0006	Organisation	Roy	Warren	Sport England	Yes	B9	Yes		Yes		The principle of masterplanning South Benfleet Playing Fields as a multi-functional green space is welcomed as this would encourage sport and physical activity to take		No	Not Answered		A	Supports B9 for the redevelopment of South Benfleet Playing fields to create a multifunctional green space	Support noted.	N

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											place. Criterion 5 is particularly welcomed as it will help ensure that the existing playing pitches which make an important contribution to its multi-functional role are not lost or prejudiced by future proposals. This would be consistent with Government policy in paragraph 104 of the NPPF.						without overall loss of existing playing pitch provision.		
0738-0007	Organisation	Roy	Warren	Sport England	Yes	HA D4	Yes		Yes		Land south of Scrub Lane (Ref: 318) was land last used as a playing field albeit many years ago. The site was allocated in the previous Local Plan that was not adopted. Sport England's position on this allocation when consulted in the past was that based on the individual circumstances of the site (including the limited size of the site and the lack of ancillary facility infrastructure) the principle of development would be acceptable if mitigation could be secured in the form of an appropriate financial contribution in lieu of direct replacement playing field provision that could be used towards new or enhanced playing field provision in the Borough. This is justified due to the deficiencies identified in the Council's Playing Pitch Strategy as the site could be brought back into use to help address these		No	Not Answered		A	Supports the development of Land South of Scrub Lane with the appropriate financial contribution towards new or enhanced playing fields within the locality.	Support noted.	N

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											deficiencies. The requirement in part 5 of the policy (and paragraph 10.30 of the reasoned justification) for the loss of playing field land to be mitigated by an appropriate financial contribution towards new or enhanced playing fields nearby is therefore supported. This requirement is considered to be necessary to ensure that the policy accords with the Council's evidence base (Playing Pitch Strategy) and Government policy in paragraph 104 of the NPPF.								
0738-0008	Organisation	Roy	Warren	Sport England	Yes	THUN2	Yes		Yes		The site contains strategically important community sports facilities that serve the Thundersley, Benfleet and Hadleigh areas of the Borough namely the Runnymede Leisure Centre and USP College. The requirement in part 1 of the policy (and paragraph 11.12 of the reasoned justification) re-provide the community uses with equivalent or better provision either on-site or off-site is welcomed as this should ensure that any future proposals that require the redevelopment of theses facilities will make provision for their replacement. This would accord with the Council's evidence base (Playing		No	Not Answered		A	Runnymede Leisure Centre and USP College provide strategically important community sports facilities for Thundersley, Benfleet and Hadleigh. Supports Part 1 of policy Thun 2 for the provision of equivalent or better on or offsite facilities as part of the redevelopment of this site.	Support noted.	N

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											Pitch Strategy and Built Facilities Strategy) and Government policy in paragraph 104 of the NPPF.								
0738-0009	Organisation	Roy	Warren	Sport England	Yes	D1	Yes		No	Positively prepared, Consistent with national policy	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that a design objective does not encourage development to be designed to encourage physical activity. While reference to Sport England's Active Design is made later in the plan in paragraph 16.34 of the reasoned justification to Policy D2, there is no specific objective in the design principles policy. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional objective to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF as well as the Active Design guidance. An objection is therefore made to the Local Plan in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness	To address this, it is requested that an additional design objective is included in Policy D1 along the following lines: "Maximise opportunities for encouraging physical activity" It is also requested that the reasoned justification then provides a short explanation of the importance of designing developments to encourage physical activity and that Sport England's Active Design guidance is signposted to for detailed advice on how this can be achieved in practice.	No	Not Answered		A	In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that a design objective does not encourage development to be designed to encourage physical activity. While reference to Sport England's Active Design is made later in the plan in paragraph 16.34 of the reasoned justification to Policy D2, there is no specific objective in the design principles policy. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional objective to address this matter would allow the policy to be	Noted, see modifications	Modification to Policy D1 p. Maximise opportunities for encouraging physical activity. Modification to paragraph 16.28 Developments have the potential to improve accessibility and local permeability by making places that connect with each other and are easy to move

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																	consistent with paragraphs 96(c and 129(e of the NPPF as well as the Active Design guidance. An objection is therefore made to the Local Plan in its current form as it would not be considered to meet the ‘positively prepared’ or ‘consistent with national policy’ tests of soundness. To address this, it is requested that an additional design objective is included in Policy D1 along the following lines: “Maximise opportunities for encouraging physical activity” It is also requested that the reasoned justification then provides a short explanation of the importance of designing developments to encourage physical activity and that Sport England’s Active Design guidance is signposted to for detailed advice on how this can be		through. This also encourages the use of active travel and encourages physical activity. Promoting legibility through development helps to provide recognisable routes, intersections and landmarks to help people find their way around; and make faster journeys . Sport England have also develop

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																	achieved in practice.		ed ‘ten principles to inform active design’ which provide guidance on how the design of environments can help people lead more physically active and healthy lives.
0738-0010	Organisation	Roy	Warren	Sport England	Yes	INFRA3	Yes		No	Positively prepared, Consistent with national policy	In view the Local Plan’s vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to	To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines: “Expecting developments to be planned and designed to encourage more active and healthier lifestyles” It is also requested that the reasoned justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England’s	No	Not Answered		A	In view the Local Plan’s vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover	See modifications proposed	Modification to Policy Infra3 (to be inserted as f. and subsequent renumbering) f. Expecting all development proposals to be planned

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											support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF. An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness.	Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.					preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF. An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness.To address this, it is requested that an additional requirement is		and designed to encourage more active and healthier lifestyles; New paragraph to be added to Reasoned Justification after 19.50 Designing developments to promote active and healthier lifestyles is central to creating sustainable communities. Incorporating walking, cycling,

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																	included in Policy Infra3 along the following lines: “Expecting developments to be planned and designed to encourage more active and healthier lifestyles” It is also requested that the reasoned justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England’s Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.		green spaces, and accessible sports facilities encourages daily activity, supports wellbeing, and reduces car dependency. Development proposals should have regard to the Sport England Active Design Guidance.
1021-0001	Individual	Chloe	Johns		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified	The area is overpopulated already and the new flats will overlook a primary school playground.	Do not add more houses on every bit of grass you find in the area. We need more healthcare services not more residences.	No	Not Answered	Not Answered		Objecting to HAD4 because: New flats will overlook the primary school no houses on every piece of green field More doctors needed	Overlooking Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and	N

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																		the school playing field to safeguard school children and residents. Location of development The council has taken an urban first approach allocating brown and green field land for development to provide housing and safeguard development in the greenbelt. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1022-0001	Individual	Lisa	Beasley		Yes	Whole Plan	Yes		Yes	Consistent with national policy			Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant	Support noted.	N
1023-0001	Individual	sean	quartermaine snr.		Yes	C4	No	i only heard about this through my son everyone should have been contacted.	No	Positively prepared, Effective, Justified	how can it be fair to put thousands of houses on canvey we dont have the infrastrctre to cope. what about the schools, doctors	dont build that much on canvey its not fair on us why should we take all of benfleets housing needs. build them somewhere that	No	Not Answered	Not Answered	A	no building on canvey concern for loss of jobs on charfleets	Comments noted Loss of jobs on charfleets	N

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											and roads?? canvey is the wrong place to build this many houses its wrong and we all know you wont build any new roads to make it worse its awful getting off canvey in the morning already you should build new towns in north essex instead or if not build it next to the motorway not canvey.	has proper access to roads. and why build it all around charfleets we need jobs on canvey too.						Policy C4 includes a 10% increase on commercial floorspace and does not encourage the loss of jobs	
1024-0001	Individual	Alison	Millin		Yes	SP3	No	I do not believe that there has been sufficient engagement with areas in the vicinity of Castle Point to make agreements on infrastructure, agreements that would be beneficial to our borough. It does not provide sufficient housing supply to comply with targets set by government.	No	Positively prepared, Effective, Justified, Consistent with national policy	The plan does not provide evidence to explain why it believes that the government target cannot be met, in fact a huge shortfall in housing numbers. The blinkered approach of not building on greenbelt land, repeated ad nauseam, with no consideration of areas which may technically be described as greenbelt but in fact are scruffy and/or mixed use and semi-industrial, is not at all a sound approach. The glaring omission is the area in NW Thundersley. The issue of access has been viewed as an insurmountable problem rather than efforts made to engage with ECC to find a solution. The online behaviour of some councillors in this respect has been unacceptable, with photographs of field but none of the industrial areas. Any comments	- increased use of brownfield sites - positive approach and fuller appraisal to NW Thundersley including proper co-operation with ECC. This is a key solution: incorporating existing green spaces whilst providing quality housing and infrastructure, thereby protecting true greenbelt against speculative development and resisting attempts to increase density on Canvey Island	No	Not Answered	Not Answered		Not meeting housing targets infrastructure North West Thundersley Flooding on Canvey	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	N

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											highlighting the possibility of incorporating this area within the plan have been pounced on, often with residents being subject to ridicule and even bullying in late-night rants. This is not a positive preparation of a plan, far from it. Falling so short of government targets immediately renders the plan ineffective. The numbers proposed for Canvey Island make this plan completely unjustified. An area which is already lives under a continual threat of flood due to its low elevation and complex drainage issues, cannot flourish with additional housing at the levels proposed. A storm or high tide would easily cause the failure of drainage solutions.													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 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. 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. Flooding 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 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.	

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1025-0001	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.	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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government	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	Yes	Not Answered	Yes	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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											intervention. The policy is based on the total over development of urban sites 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 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. 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						building on the Greenbelt is biased and predetermined.Gre enbelt 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	

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											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 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						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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											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. 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								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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											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 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 benefits 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								

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											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 unsound plan makes this site a high risk.								
1025-0002	Individual	Martin	England		Yes	Forword	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	No	Justified, Consistent with national policy	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		Yes	Not Answered	Yes	A	Unhappy with councillors conduct with regards to public consultation	Noted.	N

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								with a duty to cooperate. The policy of not building on the Greenbelt is biased and predetermined.			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 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.								

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1025-0003	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.	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	Yes	Not Answered	Yes	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. 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.						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	

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																	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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																		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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1025-0004	Individual	Martin	England		Yes	HA D4	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.	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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government	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	Yes	Not Answered	Yes	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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											intervention. The policy is based on the total over development of urban sites 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. 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 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								

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											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.								
1025-0005	Individual	Martin	England		Yes	HAD3	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.	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	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 Remove the Had3 Hadleigh Clinic site from the local plan	Yes	Not Answered	Yes	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 surplus to requirement. Should the NHS decide that they need this building the proposed site would not be built upon.	N

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											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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. The Had3 Policy is a perfect example of the over development urban policy, 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									

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											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-provided the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill 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.									

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1025-0006	Individual	Martin	England		Yes	C7	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.	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	Yes	Not Answered	Yes	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.	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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. 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 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									

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											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 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								

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											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.								

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1025-0007	Individual	Martin	England		Yes	HO U5	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.	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	Yes	Not Answered	Yes	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	Noted.	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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. 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									

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											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 local residents. The local plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different.								
1025-0008	Individual	Martin	Engl and		Yes	B8	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.	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. Co 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	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 Remove Manor Trading Industrial Estate site from the plan.	Yes	Not Answered	Yes	A	Concern for the businesses currently operating at manor trading estate Lack of engagement with businesses Forcing businesses onto canvey Innacurate mapping as MTE is 12.5ha not 14ha Not suitable for housing	Businesses in operation The purpose of policy B8 is not to remove employment opportunities from the borough, it is a way to bring investment and regeneration to an area of which the urban environment could be improved. The allocation specifies a requirement of at least 10% increase in industrial and commercial building floor space.It does	Policy B8 Page 63 insert map to be updated to reflect policy map (removing 4 bungalows in the south west corner).

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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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. 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													not intent for the loss of jobs, buisnesses or buisness commercial spaces. The purpose of this allocation is not to relocate any businessess. Lack of engagement with buisnesses The owner of the site submitted the land through the call for sites. If an application for development is submitted to the council the buisnesses will all be consulted. Further to this there have been multiple consultations on the Castle Point Plan where anyone has been welcome to comment. Please see the consultation statements for more information on how these were publicised. Innacurate mapping Comments	

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											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 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.													noted. A modification will be added to update the insert map on page 63 to reflect the policies map which excludes the four bungalows fronting onto church road. The 14ha of employment land is still accurate as this is solely a measurement for employment land. Housing suitability Policy B8 requires a masterplan to ensure that the location of housing within the site is suitable and ensures that residential amenity is not impacted.	

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											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 undoubtedly 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.								

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1025-0009	Individual	Martin	England		Yes	C4	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.	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. Remove Charfleets Industrial Estate site from the plan.	Yes	Not Answered	Yes	A	Objects to C4 because: impact on businesses shouldn't have housing on this site	Businesses in operation The purpose of policy C4 is not to remove employment opportunities from the borough, it is a way to bring investment and regeneration to an area of which the urban environment could be improved. The allocation specifies a requirement of at least 10% increase in industrial and commercial building floor space. It does not intent for the loss of jobs, businesses or business commercial spaces. The purpose of this allocation is not to relocate any businesses. Housing suitability Policy C4 requires a masterplan to ensure that the location of	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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. 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								housing within the site is suitable and ensures that residential amenity is not impacted.	

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											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 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.								

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1025-0010	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.	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	Yes	Not Answered	Yes	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 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 building on the Greenbelt is biased and predetermined.Gre	<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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. The Infrastructure Delivery Plan has not identified the infrastructure required to meet the demands of new development in NW Thundersley. The Council 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						enbelt 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.	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	

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											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, 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													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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											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.							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. <u>SUDs</u> Policy SD3 covers SuDs and part 3 states they must reflect and respond to site circumstances	

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																		and have regard to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1025-0011	Individual	Martin	England		Yes	THUN3	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.	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	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	Yes	Not Answered	Yes	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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											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. An unsound plan will put all Greenbelt sites at risk to speculative development and all our precious Greenbelt sites need total protection from government intervention. The policy is based on the total over development of urban sites 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. 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	Remove the Thun3A Thundersley Clinic site from the local plan								

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											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-provided the same service elsewhere in the Thundersley area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill 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 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.									

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1026-0001	Individual	Lisa	Meggenniss		Yes	SP3	No	I don't know the legal side of this but it's not fair I don't see how that can be legal to be so obviously biased and just doing what a certain party wanted at the election rather than do what's right for people on Canvey and in Castle Point as a whole.	No	Effective, Justified	Canvey is the worst place in Castle Point to build so many houses. Although I think we have to take our fair share, what the council has proposed is not fair at all. What justification is there for putting most of the houses on an island which has ONE traffic point where all 40 thousand of us have to go through rather than Castle Point where you have multiple real exits? Our one point is Waterside roundabout with two roads off for all of us what if there is an emergency like a flood? We lost a school (old Castle View) on the island but now we're going to add thousands of extra people where are they supposed to go? Are there any council houses that are going to be built or will they all be expensive houses that local people can't afford? You should start again and do it FAIRLY so that everyone takes their fair share not just dump it all on Canvey!	Spread the houses out more fairly, so areas that have better infrastructure take more or even better, build new infrastructure instead of just making Canvey your dumping ground without any real improvements.	No	Not Answered	Not Answered		Doesn't want so many houses on canvey Flood risk on canvey Infrastructure	Comments noted 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 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	N

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																		form of the SFRA and IDP, including in relation to Canvey. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
0738-0011	Organisation	Roy	Warren	Sport England	Yes	INFRA4	Yes		Yes		The policy is supported (especially part 2 and 4) as it supports the protection of open space including playing pitches unless suitable criteria are met. The policy would be considered to be justified by the Council's evidence base for sport (Playing Pitch Strategy) and paragraphs 103 and 104 of the NPPF and Sport England's Planning for Sport Guidance and Playing Fields Policy https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance		No	Not Answered		A	Supports INFRA4 and its protection of open space and playing pitches	Support noted.	N
0738-0012	Organisation	Roy	Warren	Sport England	Yes	INFRA5	Yes		Yes		The policy and its reasoned justification are supported as it supports the protection of indoor sports		No	Not Answered		A	Supports INFRA5 and the protection of and provision of	Support noted.	N

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											facilities and securing provision for additional or enhanced indoor sports facilities and outdoor sports facilities/playing pitches in new development. The policy and reasoned justification would be considered to be justified by the Council's evidence base for sport (Playing Pitch Strategy and Built Facilities Strategy) and paragraphs 103 and 104 of the NPPF and Sport England's Planning for Sport Guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=planning_for_sport_guidance						enhanced indoor sports facilities		
0738-0013	Organisation	Roy	Warren	Sport England	Yes	T1	Yes		Yes		The policy is supported due to its focus on supporting sustainable and active travel modes which will encourage physical activity. In particular, part 2 of the policy (and paragraph 20.10 of the reasoned justification) is supported as this requires new development to be designed using active design principles so that people can walk, cycle and wheel in their local area with ease. The policy would be considered to accord with Government policy in paragraph 96(c) of the NPPF.		No	Not Answered		A	The policy is supported due to its focus on supporting sustainable and active travel modes which will encourage physical activity. In particular, part 2 of the policy (and paragraph 20.10 of the reasoned justification) is supported as this requires new development to be designed using active design principles so that people	Support noted.	N

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																	can walk, cycle and wheel in their local area with ease		
0738-0014	Organisation	Roy	Warren	Sport England	Yes	T3	Yes		Yes		The policy is supported due to its focus on measures that will support active travel improvements which will encourage physical activity. In particular, part 5 of the policy is supported as this would support active travel routes through public open spaces which would provide opportunities for people to be active when they are travelling to open spaces where they will participate in physical activity. The policy would be considered to accord with Government policy in paragraph 96(c) of the NPPF.		No	Not Answered		A	The policy is supported due to its focus on measures that will support active travel improvements which will encourage physical activity. In particular, part 5 of the policy is supported as this would support active travel routes through public open spaces which would provide opportunities for people to be active when they are travelling to open spaces where they will participate in physical activity	Support noted.	N
1092-0001	Organisation	Una	Kipps	St James the Less Church and as an	Yes	HAD1	Yes		No	Effective	".. to substantially improve the setting of the church" is such a vague statement it is impossible to tell what is meant by this. You're planning to build on the nearest carpark (Castle Lane) used by many church-users, many of		No	Not Answered	Not Answered		What is meant by improving the setting of the church? Concerned at the loss of castle lane car park	As part of the regeneration to Hadleigh Town Centre proposed in policy HAD1 there will be opportunities to respect and enhance the	N

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				individual							whom would have difficulty with the distance from other parking. What else?							setting for the church as a heritage asset The development of the castle lane car park will be done in conjunction with the coordination of parking provision in the town centre to consolidate parking arrangements.	
1421-0001	Organisation	Mark	Silverman	Star Plans Ltd	Yes	GB1	No	To whom it may concern, Thank you for providing a further opportunity for comments to be provided on the Regulation 19 draft Castle Point Local Plan (2026-2043). I am writing on behalf of the Jewish Community of Canvey Island (JCOCI) Educational Foundation. The JCOCI site on Meppel Avenue is the principal hub for the Jewish community on Canvey Island and has benefited from significant investment since being acquired by the community in 2016. The 'urban first' approach in the draft plan is noted along with paragraph 6.33 which states that the plan "seeks to protect the Green Belt in line with the outcomes of the Green Belt Assessment". The draft plan and its accompanying	No		The justification for the removal of MAGB14 is set out in Appendix A and recognises that the majority of the site is developed for educational use. The report notes "that an alteration was sought to the Green Belt boundary in this location within the Borough's previous and withdrawn Local Plan. The Inspector's final report (03.03.22) concluded in paragraph 43 that exceptional circumstances exist for the removal of this area from the Green Belt, although it was concluded that there were no exceptional circumstances to remove the playing fields to the North from the Green Belt." There is no justification for retaining the site in the Green Belt and as such,	JCOCI would support a main modification which commits to addressing this anomaly on the Policies Map and would be willing to enter into a Statement of Common Ground with the Council to reflect this.					The JCOCI seeks the removal of Green Belt Parcel MAGB14 from the Green Belt.	Outside of the removal of the Gypsy and Traveller sites and the River Thames there are no removals from the Green Belt. This is inclusive of School Playing Fields.	N

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								policies map, however, do not reflect the recommendations of the Council's own Green Belt Assessment (July 2025) with regard to the 'potential major anomalies' identified in the report, including MAGB14 (USP College XTEND Digital Campus and Jewish Community and School, Canvey Island) and the recommended removal of 2.8ha of land at Meppel Avenue from the Green Belt.			that aspect of the plan would fail to meet the tests of soundness. JCOCI therefore objects to Policy GB1 – Development affecting the Green Belt which states that "Development within the Green Belt, as defined on the Policies Map, will not be supported in line with the NPPF" (emphasis added). Removal of the site from the Green Belt would facilitate any future development on the site to meet the needs of the Jewish community and avoid a need to demonstrate that the site is grey belt and/or advance very special circumstances, each time a planning application is submitted.								
0701-0001	Individual	Gavin	Roberts on	STW FM Co Ltd	Yes	SP3	Yes		No	Positively prepared, Effective, Justified	There is little within the Canvey Island allocation of dwellings that is Positively Prepared. Density of housing levels within Canvey Island are being expanded without consideration towards the infrastructure ie education, transportation, medical and citizen amenities. Moreover, to expand an island dwelling base where there are already severe strains on existing facilities is short sighted and unprofessional, this is NOT a “build it they will come” experiment. From an effective point of view....There is little	Re consider the option of North West Hadleigh site (known as the Blinking Owl site) for utilisation and Dwelling use of that brown field site rather than flatten the Charfleets industrial area within Canvey Island only to relocate that site elsewhere on Canvey.....in order to build those 3000 dwelling. This is almost a nonsensical decision unless you want to do things twice!	Not Answered	Not Answered	Not Answered	A	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	N

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											consideration for quality and the word quantity seems to be the top of your agenda. There are suitable alternatives in order to achieve the housing plan targets elsewhere with Castle Point.....namely North West Hadleigh. From a justified stand point it makes little sense in overloading an already stretched Canvey, in order to house over 3000 homes when Canvey Island has already an expansion of over 150 homes a year by the Sandy Bay project....this was not mentioned in your proposals and indeed on discussion...your planning team knew nothing of this Sandy Bay number or development as it did not need their approval. This is why I am complaining to your loaded survey is ill conceived. poorly executed and lacking in justification.							2025 North West Thundersley transport evidence. Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred.	
0965-0001	Organisation	Michael	Priault	Swifts Local Network : Swifts & Planning Group	Yes	ENV 5	Yes		No	Effective	This policy and clause is very welcome and positive to implement NPPG swift brick guidance, but to make it fully sound and effective we request that you add "or equivalent" after "British Standard BS 42021:2022", for flexibility, because the British Standard may be updated, or other newer best-practice guidance be published, and small projects may not have access to the British	To make this clause fully sound and effective, we request that you add "or equivalent" after "British Standard BS 42021:2022". If preferred, instead write "such as" before "British Standard..."	Yes	Not Answered	Not Answered	A	This policy and clause is very welcome and positive to implement NPPG swift brick guidance, but to make it fully sound and effective we request that you add "or equivalent" after "British Standard BS 42021:2022", for flexibility, because	Noted and agreed	1. For any grant of planning permission for new build developments greater than 5 metres in height,

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											Standard. If preferred, instead write "such as" before "British Standard..."						the British Standard may be updated, or other newer best-practice guidance be published, and small projects may not have access to the British Standard. If preferred, instead write "such as" before "British Standard..."		that there must be a minimum average of one swift brick or box per dwelling or unit. Where feasible, swift bricks integrated into walls must be installed in preference to external swift nest boxes, following best practice guidance (British Standard BS 42021:2022 or equivalent)

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0280-0001	Individual	Mertusa	Merchant	t Rida London Ltd T/A Urban Blaze	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 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	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 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.	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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											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.						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 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		

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																	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! Questions over consistency with CPBC Regeneration policies		

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1027-0002	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	SP3	Yes		No	Positively prepared, Justified, Consistent with national policy	Policy SP3 states that the Castle Point Plan will deliver a minimum of 6,196 new homes over the period 2026-2043. In paragraph 6.52 of the draft Local Plan it is recognised that the current target for Castle Point, as established using the standard methodology set out in the revised NPPF of December 2024, is 686 new dwellings per annum. This equates to 11,662 over the Plan period. Paragraphs 61 and 62 of the NPPF state that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community. 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. Paragraph 146 of the NPPF	The draft Plan is not Sound, as it is not 'positively prepared', it is not 'justified' and is not consistent with national policy. The draft Plan does not seek to deliver the minimum number of homes needed, based on the standard method, and could and should explore, at a much more granular level, options to meet the Government's standard method derived housing need.	Yes	Not Answered		A	Does not meet housing targets North West Thundersley	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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											states that Green Belt boundaries should be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in the Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. The draft Plan states that the evidence base has shown that achieving that 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 protecting and enhancing the natural environment set out in policy SP1, by impacting on												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. 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	

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											protected areas and frustrating a landscape scale approach to green infrastructure and nature recovery. Furthermore, transport modelling has shown that the road network in Castle Point operates at capacity already, and the impacts of growth would be severe. There are also constraints related to health service provision. Demand on health services in South East Essex have grown but this has not been aligned with sufficient revenue funding to meet needs. Consequently, whilst this Plan could reasonably secure new health facilities, the local health services are unable to resource such facilities with staff. However, the 2025 Green Belt Review does not consider all land parcels in the Borough and there are significant areas that were not assessed. The 2018 Review considered wider parcels that did cover the Borough, but one large area (central corridor) was totally ruled out because: “These parcels of Green Belt serve to restrict the settlements of South Benfleet and Thundersley from merging and also create a connection													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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											between the northern Green Belt parcels within the borough to those in the south. Without this linkage, the demarcation of these two urban areas would be indistinct and the wider Green Belt of Castle Point would become additionally fragmented. At a sub-regional level this corridor is particularly important as it plays a role in linking the strip of Green Belt running along the Thames Estuary to the Green Belt extending between Rayleigh and Wickford and across towards Basildon” These were large areas and no further detailed analysis was undertaken on smaller parcels within these areas – for example the Central Corridor which varies significantly in land area between the north, the south and the middle. The 2025 Green Belt Assessment assessed smaller parcels, but this was selective and did not comprehensively cover the whole Borough. There is limited or no valid justification as to why only a few particular sub-areas were selected. The Green Belt Review 2025 is flawed, as it should comprehensively review all									

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											Green Belt land. For example, the 2025 Assessment states that the Council previously identified an area of 160ha GB16 (North West of Thundersley) as a potential Green Belt site option and this was assessed at a parcel level (as parcel 1) in the 2018 Green Belt Review. Paragraph 5.1.2 of the 2025 assessment states: ‘Parcel 1 possesses a complicated fabric with fragmented land ownership and a varied planning history and contexts relating to individual sites. It is therefore deemed to be inappropriate to assess this as a sub-area within our assessment and instead sub-areas have been assessed at a more appropriate level of granularity’ (para 5.1.2). However, this is not appropriate reason to exclude large areas of the land from the GB review, given that the site was considered by the Council as a potential option to meet the housing requirement and that the Council should be appropriately assessing all options. To add to this point, it should be noted that									

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											within in Parcel 1 there is much land that has been identified as being ‘potential grey belt’, as set out in Figure 18 of the 2025 assessment. This would be a further reason for giving careful consideration to potential new development in that Parcel to meet identified needs. On the other concerns raised by the Council regarding this larger area, it is evident that the Council has failed to consider the scope for mitigation of these impacts. In the context of the above and by way of an example of how the current draft Local Plan has not fully assessed all options - the Issues and Options Consultation Document of July 2024 identified Option 3 for accommodating the growth needs of the Borough. This Option was to release significant areas of Green Belt to meet the standard method need and this included land at north west Thundersley. It is noted on page 52 of the Consultation document that “Land would be identified following a Green Belt review, and any substantial Green Belt sites								

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											would include proportionate employment, infrastructure, and services to balance the increase in new homes”. The ‘pros’ of this option are listed as: - Local housing need is exceeded, producing extra choice in the local housing market. - Relatively high infrastructure contributions. - This level of growth will generate surplus labour, which may have positive consequences for the local economy. These would, therefore, address the concerns raised above, but the Council has chosen not to explore such an option. The ‘cons’ include: significant environmental impacts arising from the development of greenfield land; and increased population ‘may’ increase out commuting and associated congestion on local roads and the strategic road network. However, there was no evidence produced showing significant environmental impacts on designated sites (there are very few) and no evidence of out commuting is provided. The draft Plan is not								

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											Sound, as it is not 'positively prepared', it is not 'justified' and is not consistent with national policy. The draft Plan does not seek to deliver the minimum number of homes needed, based on the standard method, and could and should explore, at a much more granular level, options to meet the Government's standard method derived housing need.								
1027-0003	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	GB1	Yes		No	Effective, Consistent with national policy	Policy GB1 is not consistent with the NPPF and should be amended to reflect national policy. Paragraph 153 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate	Policy GB1 is not Sound as it is not consistent with the NPPF or effective. It should be amended to align with the NPPF.	Yes	Not Answered		A	Is of the view that it is not consistent with the NPPF	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	N

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											development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 154 notes that development in the Green Belt is inappropriate unless one of the listed exceptions apply. Policy GB1 is not Sound as it is not consistent with the NPPF or effective. It should be amended to align with the NPPF.							(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 additional cars that will enter	

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																		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.	
1028-0001	Individual	Jade and Michael	Pittman		Yes	SP3	No		No	Effective, Justified	It's not 'appropriate' to build that much on Canvey without a third road. The infrastructure can't cope and from what I've seen of the plan they aren't going to meaningfully ensure that it's improved. How can you take away business areas and not sensibly plan for the future of employment on Canvey that will just force more people off the	See previous answer.	No	Not Answered	Not Answered		Concerned regarding the amount of homes planned for Canvey Island Concerned regarding the loss of employment space Infrastructure	Comments noted The plan does not reduce the amount of employment space and plans for employment growth on Canvey Island Infrastructure Infrastructure matters	N

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											Island and cause more carnage at Sadler's farm roundabout which affects all of us in Benfleet as well. The numbers for Benfleet, Thundersley, etc. seem a lot more reasonable, and you should have the same approach for Canvey as well. I want to protect the green belt but I also want a fair plan that reflects the needs of the area more. If you can't get the numbers down more, you should see if neighbouring areas are willing to take on some of our numbers, and if you can't then you should look at building in a way where the new builds don't have loads of cars and instead have good public transport options.							(including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1029-0001	Individual	JEAN	ANDOW		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1030-0001	Individual	Frank	Andow		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1031-0001	Individual	Emily	Cox		Yes	HAD4	Yes		No	Effective	It will cause absolute aggravation on the roads that are already busy and congested. The school is too close to have a number of properties built in such close proximity.		No	Not Answered	Not Answered		Objecting to HAD4 because: Traffic Close proximity to the school	Traffic Capacity Any application for homes on this site will have to comply with policy T6 which ensures that	N

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																		development proposals offer safe access to the highway. Any proposal will also have to comply with T5 to ensure sufficient highway impact mitigation. Close proximity to the school Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents.	
1032-0001	Individual	Saphire	Sidey		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	Completely unnecessary and unacceptable putting properties facing a school. These grounds are walked through daily by the children. We do not need more housing!!!! We need more amenities - doctors, dentists. Not more overcrowding!!	Keep some grass land!! Stop making Hadleigh into a concrete jungle. It is so disappointing to see what this council is doing. Focus on green spaces!! Stop focussing on profits!!	No	Not Answered	Not Answered	A	Objecting to HAD4 because: Infrastructure Close proximity to the school	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Close proximity to the school	N

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																		Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents.	
1033-0001	Individual	Nick	Turner		Yes	HAD3	Yes		Yes		Consistent, could be even more joined-up by more closely defining acceptable alternative premises; and related parameters.	Paras 10.24 and 10.25 are logical as far as they go; but could be more vigorously pursued to achieve greater savings and a more harmonious visual landscape. The proposal has clear merits, and these could be expanded by incorporating a complete redesign of the area to include Broom House and the Bus Garage. The definition of the replacement health facility in Hadleigh, should include ground floor unimpeded access, suitable for pushchairs, wheelchairs and people of all ages with a bus stop on a main route nearby. The current Clinic is an admirable focus of health resources for Hadleigh, very close to a bus stop and with easy access. It is also an historic asset with a plaque from its	No	Not Answered	Not Answered	A	Expand the site to include Broom House and the Bus Garage Specify that any new facility should have accessible access honour the historic aspect of the existing health facility	The site HAD3 is currently available for development, other sites in the vicinity are not available for development. The site will be masterplanned with regard to the Design policies within the Castle Point Plan including accessible design	N

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												opening ceremony; the replacement facility should therefore incorporate a name signifying its history, and have a blue or purple plaque to commemorate the original act of creating the Hadleigh Clinic as an important Health Centre.							
1034-0001	Individual	Sharon	O'Donoghue		Yes	SP3	No	Didn't contemplate other possibilities eg North West Thundersley. No convincing five year housing land provision.	No	Consistent with national policy	It fails to achieve housing targets, contrary to national guidelines with erroneous site selection application, It is not consistent with national policy. It doesn't meet the housing target for Castle Point, and the site selection ignores Green belt /Grey belt against new NPPF guidelines. It is not justified, the site selection strategy is biased and predetermined towards a "no Green belt build policy", it is solely based on the "over development of Brownfield sites", has not considered all sites, with no Green belt or Grey belt sites added and the exclusion of the North West Thundersley site. I 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	Add North West Thundersley site, 187 Ha as a Green belt , Grey belt, Brownfield site option for 7500 homes. Reduce the urban housing target to 3500 from 6200, with Canvey at 1050 and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	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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											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 recognise that the Had2 Policy is about protecting this Greenbelt site as not suitable for development, but the ill conceived plan for 6200 homes places the Hadleigh farmland site at risk to development, needing planning objections with respect to urban sprawl. It is 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 affects both Hadleigh and the neighbouring area of Leigh on Sea. I can support this Had2 Policy with no housing development on this farmland site. We need a C6 Policy for this farmland site, the South Hadleigh Green Lung, to protect and enhance a													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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											strategic green infrastructure asset between Hadleigh and Leigh on Sea.							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	
1035-0001	Individual	Dean	Silk		Yes	Whole Plan	Yes		Yes	Positively prepared	i beleive lot thought went into the local plan and i tottally agree with the plan, and find it leagal and compliant.		No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support Noted	N
1036-0001	Individual	Allan	Edwards		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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													ered						
1036-0002	Not Answered	Allan	Edwards		Not Answered	SD5	Yes		Yes		SD5 - Net Zero Carbon Development (Embodied Carbon) is sound. However, given the plan seeks to maximise the delivery of homes by increased urbanisation and hence in some cases use smaller sites there is a missed opportunity to seek a reduction in embodied carbon across the borough by applying the policy to smaller sites.	Expanding the scope of the SD5 - Net Zero Carbon Development (Embodied Carbon) policy to residential sites of greater than 24 homes and an appropriately smaller area of commercial space, would deliver greater sustainability across the borough.	No	Not Answered		A	Supports policy SD5 but identifies a missed opportunity in smaller sites so requests it be applicable to sites of 24 homes or more	Noted	N
1037-0001	Individual	Michelle	Chambers		Yes	SP3	No	Oak tree felling is an offence. The infrastructure won't take any more building of houses. Don't take away our green belt areas.	No	Positively prepared, Effective, Justified	The tree roots will cause a detrimental affect to building with subsidance. The drainage system in the area can't take the strain. It is not justified to destroy natural creature habitats	Scrap the plans to build houses	Yes	Not Answered	Not Answered		No building in the green belt felling oak trees is illegal Tree roots will cause subsidence strain on drainage system no more houses	Comments noted The plan does not plan for the removal of oak trees Any development proposed would be	N
1038-0001	Individual	Emma	Cenizo-Shamshoum		Yes	SP3	Yes		Yes	Effective	As long as brown belt is being reused, not greenbelt.	Our are cannot take a large increase in housing, people or traffic due to lack of infrastructure: schools, doctors, dentists, hospitals, and the traffic is horrendous already creating pollution in our environment. We also already have a lot of flooding, due to too much housing.	No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant, as long as no green belt is used. Has some worries around impacts of too large a housing growth.	Support Noted	N

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1039-0001	Individual	Duncan	Gottobed		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 fails to meet the tests of soundness on both justification and consistency with national policy. Inconsistency with National Policy: The plan does not align with national policy requirements and fails to meet Castle Point's housing targets. The site selection process disregards Green Belt and Grey Belt considerations, contrary to updated NPPF guidelines that require proper assessment of these designations. Lack of Justification: The site selection strategy demonstrates predetermined bias toward a "no Green Belt build" policy without adequate justification. The approach relies excessively on overdeveloping brownfield sites rather than conducting a comprehensive assessment of all available options. Notably, Green Belt and Grey Belt sites have been systematically excluded from consideration, including North West Thundersley. Flood Risk and Drainage Concerns: The plan contradicts NPPF	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	Not Answered	Not Answered	A	Not meeting housing targets Five year housing land supply North west thundersley Green/Grey Belt Flood Risk on Canvey Emergency evacuation	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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											guidelines requiring development to be directed away from areas of highest flood risk. The proposed SUDS measures are inappropriate for Canvey Island's unique geographical conditions and existing drainage infrastructure, potentially exacerbating flood risks. Community Impact and Safety: The allocation of 3,316 urban homes for Canvey Island lacks adequate community consultation and resident input. Furthermore, the proposed Canvey West development compromises emergency evacuation procedures, placing existing residents in the eastern areas at increased risk during emergency situations.								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. 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 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.	

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

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1039-0002	Not Answered	Duncan	Gottobed		Not Answered	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Effective, Justified, Consistent with national policy	Inconsistency with National Policy: The draft local plan does not align with national policy requirements and fails to meet Castle Point's housing targets. Site selection disregards Green Belt and Grey Belt considerations, contrary to updated NPPF guidelines. The plan violates NPPF principles by directing development toward areas at highest flood risk rather than away from them. Lack of Justification: The site selection strategy demonstrates predetermined bias toward a "no Green Belt build" policy without proper justification. The approach relies on overdeveloping brownfield sites while systematically excluding Green Belt and Grey Belt sites from consideration (e.g. North West Thundersley). An unsound plan will expose all Green Belt sites to speculative development pressure, when Green Belt sites on Canvey West require total protection from government intervention. Policy Ineffectiveness: Policy C7 lacks clear delivery mechanisms and ongoing maintenance commitments, making it	HOUSING MODIFICATIONS: 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	Not Answered		A	Supports the vision of C7 but wants more commitment to delivery mechanisms, timescales and maintenance and 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	N

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											fundamentally ineffective. 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 identical promises without addressing why previous commitments failed or providing concrete delivery timelines, funding sources, or maintenance schedules. Infrastructure and Safety Concerns: The proposed 3,316 urban homes for Canvey lacks meaningful resident consultation. Canvey West development compromises emergency evacuation procedures, placing eastern residents at increased risk. This overdevelopment policy will strain highways and traffic capacity, overwhelm inadequate infrastructure, exceed sewage system capacity, exploit poor drainage systems, and increase flood risks to Canvey Lake. SUDS Inappropriateness: Proposed SUDS measures are unsuitable for Canvey Island's unique geography and drainage infrastructure.								

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											Support for C7 Vision with Implementation Concerns: While supporting Policy C7's vision for improving Canvey Lake, flood risk reduction, long-term management planning, water quality improvements, and habitat enhancement, the policy lacks concrete delivery mechanisms. Given CPBC's decade-long multi-agency partnership has failed to deliver meaningful outcomes for Canvey Lake's complex environmental and infrastructure needs, Policy C7 provides no commitments regarding funding sources, delivery timelines, or maintenance responsibilities.								
1040-0001	Individual	Alan	Owens		Yes	Whole Plan	No		No	Positively prepared			Yes	Not Answered	Not Answered		Castle Point Plan is not sound.	Comments noted.	N
1041-0001	Individual	Samantha	Hynes		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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1042-0001	Individual	Andrea	Gottobed		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 sound because it doesn't follow national policy and isn't properly justified. Not Following National Policy: The plan doesn't meet national policy rules and fails to hit Castle Point's housing targets. The way they've chosen sites ignores Green Belt and Grey Belt land, which goes against the updated national planning guidelines that say these areas must be properly considered. Poor Justification: The site selection is biased - they've already decided not to build on Green Belt land without giving good reasons why. They're trying to cram too many houses onto brownfield sites instead of looking at all the options available. They've deliberately ignored Green Belt and Grey Belt sites, e.g. for North West Thundersley. Flood Risk Problems: The plan goes against national guidelines that say new housing should be kept away from flood risk areas. The drainage solutions they're proposing won't work properly on Canvey Island because of our unique geography and existing drainage problems,	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	Not Answered	Not Answered	A	Not meeting housing targets Five year housing land supply North west thundersley Green/Grey Belt Flood Risk on Canvey Emergency evacuation	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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											which could make flooding worse. Impact on Residents: The 3,316 new homes planned for Canvey Island haven't been properly discussed with local residents. The Canvey West development will make it harder for people living in the east of the island to evacuate safely in an emergency, putting them at greater risk.							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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																		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. 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 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.	

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

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1042-0002	Not Answered	Andrea	Gottobed		Not Answered	C7	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Effective, Justified, Consistent with national policy	Not Following National Policy: The draft local plan doesn't follow national policy rules and fails to meet Castle Point's housing targets. The way they've chosen sites ignores Green Belt and Grey Belt land, which goes against updated national planning guidelines. The plan breaks national rules by putting new housing in flood risk areas instead of keeping it away from them. Poor Justification: The site selection is biased - they've already decided not to build on Green Belt land without giving proper reasons why. They're cramming too many houses onto brownfield sites while deliberately ignoring Green Belt and Grey Belt options (e.g. North West Thundersley). A weak plan like this will put all Green Belt sites at risk from developers, when Green Belt areas on Canvey West need complete protection from government interference. Policy C7 Doesn't Work: Policy C7 has no clear plans for how things will actually get done or who will pay for ongoing maintenance. Back in 2015, the Canvey Island 6 Point Plan said the lake needed dredging for flood	HOUSING MODIFICATIONS: 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	Not Answered		A	Supports the vision of C7 but wants more commitment to delivery mechanisms, timescales and maintenance and 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	N

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											storage - nearly 10 years later, nothing has happened. Policy C7 makes the same promises without explaining why previous plans failed or providing proper timelines, funding, or maintenance plans. Infrastructure and Safety Problems: The 3,316 new homes planned for Canvey haven't been properly discussed with residents. Canvey West development will make emergency evacuations harder for people in the east, putting them at greater risk. This overdevelopment will overload roads and traffic, overwhelm poor infrastructure, exceed sewage capacity, strain inadequate drainage systems, and increase flood risks to Canvey Lake. Drainage Solutions Won't Work: The proposed drainage measures aren't suitable for Canvey Island's unique geography and existing drainage problems. Canvey Lake Vision While the goals of Policy C7 are good - reducing flood risks, better management, cleaner water, and improving wildlife - the policy has no proper								

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											delivery plans. Without learning from the 6 Point Plan's decade of delays, Policy C7 will just become another broken promise while flood risks keep getting worse.								
1043-0001	Individual	Stephen	Tucker		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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1044-0001	Individual	Catherine	Benson		Yes	TC2	No	Firstly, your proposal highlights the site's proximity to local necessities such as schools and colleges. However, it completely overlooks the critical issue of oversubscription at our local school. Residents living within the current catchment area often struggle to secure places, and the school itself has not, to my knowledge, been consulted regarding its capacity to support a greater intake of pupils from your development. This oversight suggests a lack of understanding of the existing strain on our educational infrastructure. Secondly, the planning document states that you intend to build 3-4 bedroom homes, citing high demand. While these may indeed be profitable, it is evident that this choice prioritizes financial gain over genuine community need. The reality in Thundersley is that council waiting lists for young families seeking smaller, more affordable homes are years long. Two and three-bedroom homes are desperately needed to address the housing crisis for our local families, not just larger properties catering to a wealthier	No	Positively prepared, Effective, Justified	Firstly, your proposal highlights the site's proximity to local necessities such as schools and colleges. However, it completely overlooks the critical issue of oversubscription at our local school. Residents living within the current catchment area often struggle to secure places, and the school itself has not, to my knowledge, been consulted regarding its capacity to support a greater intake of pupils from your development. This oversight suggests a lack of understanding of the existing strain on our educational infrastructure. Secondly, the planning document states that you intend to build 3-4 bedroom homes, citing high demand. While these may indeed be profitable, it is evident that this choice prioritizes financial gain over genuine community need. The reality in Thundersley is that council waiting lists for young families seeking smaller, more affordable homes are years long. Two and three-bedroom homes are desperately needed to address the housing crisis for our local families, not just larger properties catering to a wealthier demographic. We need	The TC2 site is not compliant. See above notes	No	Not Answered	Not Answered	A	Objects to policy TC2 because: Concerned regarding school places Require more two-three bedroom homes Eroding the village character by building more No consideration for green space and environmental impact Infrastructure concerns	Castle Point has worked closely with the education authority (ECC) to ensure that there are enough school places provided The Council undertook a Local Housing Needs Assessment in December 2023 to ensure that the plan reflects the local housing needs of the Borough. Policies such as THUN5 has been implemented 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 environmental impacts of development have been greatly considered in the formation of the plans,	N

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								demographic. We need homes for the community, not merely for profit. Furthermore, your document includes a token gesture towards green spaces, yet completely disregards the fact that yet more valuable land is being taken away. Thundersley is a village in name, but this relentless building is systematically eroding its character, making it increasingly congested and unattractive. There appears to be no genuine consideration for the environmental impact or the preservation of our green spaces in this proposal. Finally, your mention of local services is equally concerning. Despite living in the heart of Thundersley, I, along with many others, struggle to access a local dentist or doctor. This development will undoubtedly place further unbearable pressure on already overstretched services, making it even harder for existing and new residents to access essential healthcare. I urge you to seriously reconsider your current			homes for the community, not merely for profit. Furthermore, your document includes a token gesture towards green spaces, yet completely disregards the fact that yet more valuable land is being taken away. Thundersley is a village in name, but this relentless building is systematically eroding its character, making it increasingly congested and unattractive. There appears to be no genuine consideration for the environmental impact or the preservation of our green spaces in this proposal. Finally, your mention of local services is equally concerning. Despite living in the heart of Thundersley, I, along with many others, struggle to access a local dentist or doctor. This development will undoubtedly place further unbearable pressure on already overstretched services, making it even harder for existing and new residents to access essential healthcare. I urge you to seriously reconsider your current plans and engage in genuine consultation with the Thundersley community												Chapter 18 Protecting our Biodiversity and Landscape is included within the plan to safeguard the environment and green spaces. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	

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								plans and engage in genuine consultation with the Thundersley community to develop a proposal that truly addresses our needs rather than exacerbating existing problems.			to develop a proposal that truly addresses our needs rather than exacerbating existing problems.								
1045-0001	Individual	Russell	Savage		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1046-0001	Individual	Clare	Savage		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1047-0001	Individual	Thomas	Savage		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1048-0001	Individual	Paul	Calvert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1049-0001	Individual	Pamela	Webb		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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1050-0001	Individual	Lina	Maknevi ciute		Yes	SP3	No	The Castle point plan does not provide the number of housing required by the Government. It only accounts for half of required housing and therefore will most definitely be found unsound by the government. It does not demonstrate that all options have been considered. This makes the plan vulnerable and gives developers a chance to submit Green belt applications.	No	Consistent with national policy	As mentioned above, this plan did not consider all viable options. North West Thundersley site could provide a large number of required housing and could make the numbers in the local plan I know that a road to NW Thundersley is possible and it is definitely the best site in terms of causing minimal impact on existing road and traffic conditions and other infrastructure such as medical centres and school as there would be an opportunity to build those there.	The plan needs to include the full number of houses required by government targets. The additional housing needs to go to the NW Thundersley site. If the plan is submitted in its current form it will definitely be deemed unsound. The plan needs to clearly prove that all grey belt options have been considered, and why any considered sites are not suitable. NW Thundersley site is most definitely suitable and it should be placed into the local plan.	Yes	Not Answered	Not Answered	A	Does not meet housing targets North West Thundersley	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. 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	

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																		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.	
1051-0001	Individual	Joe	Barnes		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N

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1052-0001	Individual	Car ey	Cooper		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. Canvey Island is referred to by Anglian Water as a blockage hotspot. Further housing will only add to an already struggling drainage infrastructure. The 3316 urban homes for Canvey is not resident led. Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	Add North West Thundersley site, 187Ha, 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	Not Answered	Not Answered	A	North West thundersley No five year housing land supply Doesn't meet housing targets Green/Grey Belt Canvey floodrisk Emergency Evacuation	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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																		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. 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 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.	

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																		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. Emergency Evacuation The Councils detailed emergency planning pages are here www.castlepoint.gov.uk/emergencyplanning/	
1053-0001	Individual	Hel en	Scar lett		Yes	SP3	Yes	Building on greenbelt land is awful. We need grass and trees. We have not got the infrastructure to support more homes - roads, doctors etc.	No	Effective, Justified		This isn't nonsense about wording. Stop allowing developers to make a fortune at the expense of existing residents.	No t Answered	Not Answered	Not Answered		No building on greenbelt land Infrastructure	The Castle Point Plan does not allocate any development on Green Belt Plan Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-	N

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																		6 and the supporting Infrastructure Delivery Plan (IDP).	
1054-0001	Individual	Erin	Calvert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1055-0001	Individual	Simon	Williams		Yes	HAD2	No	Leaves Castle Point vulnerable to government intervention. Should consider alternatives such as North West Thundersley (A130 corridor).	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 however 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	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, and Hadleigh at 305. Total housing target of 11,000.	No	Not Answered	Not Answered	A	No five year housing land supply North West Thundersley Green/Grey Belt Supports HAD2 Wants policy C6 for Hadleigh	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	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							
											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 Hadleigh farmland site at risk to speculative development, needing planning objections 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 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														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 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	

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											between Hadleigh and Leigh on Sea.							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 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)	

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																		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. 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	

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																		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 reasons set out	

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																		above. Support for HAD2 Noted. A policy for the Green Lung in Hadleigh is not considered necessary as the land is safeguarded by policy HAD3	
1027-0004	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	GB2	Yes		No	Consistent with national policy	In the heading Policy GB2 states 'previously developed land', whereas the policy also covers grey belt land and, as made clear in the glossary of the NPPF, that does not need to be just previously developed. The heading should be changed to reflect what the policy covers. Point 1b should also be amended to reflect the wording in paragraph 155a of the NPPF namely '...not	See above - Policy GB2 is not Sound, as it is not consistent with the NPPF. It should be amended to reflect the NPPF.	Yes	Not Answered		A	In the heading Policy GB2 states 'previously developed land', whereas the policy also covers grey belt land and, as made clear in the glossary of the NPPF, that does not need to be just previously developed. The heading should be changed to reflect what the policy covers.	Grey Belt is addressed across the Green Belt policies and is not specific to GB2. Part B reflects the NPPF without duplicating it which is not the purpose of a Local Plan Part e ensures	N

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											fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan'. This should also allow for the potential scope to make the case that a site is grey belt, even if it is not identified in the Green Belt Review as this does not review all of the Green Belt land comprehensively (paragraphs 1.1.3 and 5.1.1 of the Green Belt Assessment 2025). Part e is not required. Policy GB2 is not Sound, as it is not consistent with the NPPF. It should be amended to reflect the NPPF.						Point 1b should also be amended to reflect the wording in paragraph 155a of the NPPF namely '...not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan'. This should also allow for the potential scope to make the case that a site is grey belt, even if it is not identified in the Green Belt Review as this does not review all of the Green Belt land comprehensively (paragraphs 1.1.3 and 5.1.1 of the Green Belt Assessment 2025). Part e is not required. Policy GB2 is not Sound, as it is not consistent with the NPPF. It should be amended to reflect the NPPF.	the proposals comply with other policies in the plan which is considered necessary.	

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1057-0001	Individual	Sam	Read		Yes	HAD4	No		No	Positively prepared, Effective, Justified, Consistent with national policy	I don't feel the draft has considered the impact of the local residents and needs of the area. There has been no consideration regarding the traffic issue that is experienced on this road, which constantly gets busier. The houses are built so close together that there is no room for parking which in turn makes scrub lane a car park. The environmental issue of 114 houses worth of waste and sewage on the local area and the lack of green space. The school it backs on to already cannot support the number of students wishing to attend let alone having more. The document states footpaths and cycle lanes that currently don't exist, and with busier roads I don't see how they can exist.	More clarification on how they came to the number of 114 of homes and not less. The houses on this street are large with plenty of land. The number proposed will mean they are small, no land and won't fit in with the current houses. Not mentioning the lack of parking or facility for parking. The school already causes traffic issues, less space and more students will mean more traffic being funnelled in to a smaller space, this is not safe.	Yes	Not Answered	Not Answered		Objecting to HAD4 because: Traffic No parking provision Infrastructure How did they get to 114	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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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																		Density of the site The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details	
1058-0001	Individual	John	Champion		Yes	SP3	No	Like most residents, (& even Councillors!), I am not legal expert on Planning Laws. However, my understanding from National Government comments and media, it appears a legal requirement to try and meet Housing targets under NPPF. The Plan only meets just over 50% of target and I feel that Inspector/Whitehall or Ministry will look no further in assessing it. In my view the Central Govt target is also 'unsound' and unrealistic. Castle Point is not only short on own infrastructure (Roads, Health in particular) but sits on the 2 major exits routes from City of Southend (A13/A127) to the East. Their development targets, even in a reduced form are	No	Effective, Consistent with national policy	Only meets c.50% of National targets for housing needs under NPPF, although that figure is totally unrealistic. See 2b above. The current rate of building new property is far below the rate proposed in the Plan already, and the increase to NPPF rate is simply unrealistic. Apart from land availability, there are not resources including labour) available to achieve it. There is a heavy proportion of the proposed housing need placed on Canvey Island. Given the current issues with access to/from the Island, as well as flood risk, this does not seem appropriate. The planned building is heavily back loaded into years 11-17.	A robust explanation specifically detailing why the NPPF target should be significantly reduced. I support the principle of prioritising development in urban areas / brownfield sites and retaining as much existing green belt areas as possible, although some of these have already been lost in absence of a plan eg Land north of The Chase. Owners in the area may disagree, but I think there should be detailed study of potential development of area known as NW Thundersley / Blinking Owl. There are already some buildings there and it provides opportunity for access to major trunk roads in District without impacting already gridlocked towns and villages. I consider this has potential to meet significant part of housing	No	Not Answered	Not Answered	A	Not meeting housing target North West Thundersley Support the councils urban first approach Objects to removal of car parks in hadleigh Questions local bus rerouting/frequency	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	N

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								unsustainable in additional transport vo;umes that would pass through Castle Point on road and rail. I support the Council view of concentrating on 'urban development' and retention of Green Belt sites, in particular, Salvation Army farmland, which also provides a buffer to City of Southend. Also the pocket behind Kiln Road Council Offices and unmade area of The Chase, which creates a green safe corridor and protects wildlife. I do not agree there is surplus parking in Hadleigh Town Centre, and think removal of charges or at least 'free periods' would help bring customers to local shops. The possible loss of car parks would exacebate this problem. Depsite many plans etc, nothing has still been done with Hadleigh 'Island' and has been missed opportunity by several administrations. Reading the plan, I note several comments with regard to increased usage of public transport ie buses and the wish to increase frequency and to change some routes. Moving Route 28 to Church Road				target and leave existing Green Belt untouched and reduce reliance on Canvey Island.									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 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. North West Thundersley North West Thundersley is in the Green Belt. For those reasons set out	

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								would leave Western Bnenfleet without a bus covering A13 towards Southend, although re-instatement of previous route 21 through Thndersley village would help many, particularly with access to Southend Hospital. However, it cannot be ignored that the frequency on these routes has been reduced and routes curtailed by First Bus. It would seem unlikely that they will reinstate and increase them!										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. Support to the urban first approach noted. Objection to the removal of public car parks noted Decisions regarding ammendments to bus routes/frequency are a matter for planning	

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																		application stage	

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1059-0001	Individual	Jean	Cole		Yes	HAD4	Yes		No	Effective, Justified	This submission is our response in opposition to policy HAD4 as set out on page 73 of The Castle Point Plan. As retired professionals we moved to Hadleigh in May 2025, to be closer to members of our family, but also to enjoy Hadleigh, which we believe is unique in that it has a semi rural combination of open spaces, playing fields, woodlands and a high street. We believe this combination contributes towards a strong sense of community. We believe planes to be a clear case of overdevelopment and I'm realistic it will create a density of 100 dwellings per hectare in a residential area of housing. Currently having homes of 20 dwellings per hectare. Housing on this site at 100 dwellings per hectare would equate to 6 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 the house is opposite, relate to approximately 15 dwellings per hectare and will never	We would support the development of such a community in the North West Thundersley area where there could be easier access to major road links and installation of utility and services.	No	Not Answered	Not Answered	A	Objects to HAD4 because: Density Traffic Infrastructure Concern regarding reference to hadleigh junior school and not infants school on page 212 Proposal contradicts objective 19 due to loss of a playing field North West Thundersley	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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											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 plans would also cause an extra burden on the area’s General Practitioner surgery -the Hollies- as well as affecting electrical, water, gas and other services. We note that on page 212 of the plan, that the council only lists the Hadleigh Junior school as an important asset, but does not include the infants school and nursery as part of this list. This leads us to believe that the planned development is only the first phase of further plans to build on the rest of the playing field including land currently occupied by the Hadleigh Infant School. The school playing field is in daily use by school children Monday to Friday and various football clubs at the weekend. In our opinion the development further undermines objective 19 on page 18 of the plan, which states: “Secure improved													Reference to Hadleigh Junior school as a locally important heritage asset on page 212 is due to the heritage aspect rather than the importance of the building as an education facility. Policy HAD4 requires suitable mitigation for the loss of the playing field facility in accordance with objective 19 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	

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											health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy Living environments and reducing health inequalities.” Physical activity has been shown be very beneficial in preventing and reducing obesity in children and also contributing towards good mental health. It also provides an environment for young people to develop their social skills, teamwork and communication. We believe that the council should be reaching out and consulting with various groups regarding how to make better use of the playing field in its current form, rather than reducing it with the planned development.													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.	
1060-0001	Individual	Dean	Collins		Yes	SP3	No	I think it fails to consider some basic Human Rights principles set out in the ECHR.	No	Positively prepared, Effective, Justified	1/Its not been resident led and has very much been played out on facebook rather than advertised to the wider community. 2/Far too much burden put on canvey island and anyone who feels that canvey was able to take more traffic needs to be put in a straight jacket and taken to a sanatorium. 3/The plan has very much been weighted in favour of the larger party who have protected their own wards	I don't believe even a third road could elevate the problems that these extra properties would bring. The slightest little issue now and Canvey becomes gridlocked If this plan goes through those who have engineered it at some point will undoubtedly have blood on their hands	Yes	Not Answered	Not Answered	A	Fails to consider human rights in accordance with the ECHR lack of public consultation Too many homes on Canvey due to traffic	The local Plan respects the convention rights and part of examination will confirm if it is legally compliant which includes compliance with the Human Rights Act. Public Consultation The council has prioritised	N						

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																		inclusivity for the consultations. Further details of this is included in the reg 18 consultation statement and reg 22 consultation statement. 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 networks in and around Castle Point, including	

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																		improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4.	
1061-0001	Individual	Bonnie	Grayer		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1062-0001	Individual	Jessica	Miller		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1063-0001	Individual	Lauren	Skelly		Yes	Whole Plan	No		No	Consistent with national policy			No	Not Answered	Not Answered		Castle Point Plan is not sound and legally compliant,	Comments noted.	N
1064-0001	Individual	Sam	Crawford		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N

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1065-0001	Individual	Terry	Clarke		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, 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 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	Add North West Thundersley site, reduce the urban housing target by half,	No	Not Answered	Not Answered	A	North West Thundersley No five year housing land supply Doesn't meet housing target Green/Grey Belt	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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											us the housing numbers required, and we can reduce the over development of our urban sites.							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	

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
																		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.	

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
																		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.	

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
1065-0002	Not Answered	Terry	Clarke		Not Answered	HAD3	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. 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	Add North West Thundersley site, reduce the urban housing target by half, remove the Had3 Hadleigh Clinic site from the local plan	No	Not Answered		A	Objecting to HAD3 because: Accessible clinic should not be removed	Policy HAD3 required the NHS to provide assurance that the site is surplus to requirements and that the services can be provided elsewhere nearby.	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
											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, 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-provided the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, 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								

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
											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.								
1065-0003	Not Answered	Terry	Clarke		Not Answered	HAD4	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. 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	Add North West Thundersley site, reduce the urban housing target by half, revise Scrub Lane development to 20 homes.	No	Not Answered		A	Objecting to HAD4 because: density	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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											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 the houses opposite relates								

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											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.								
1065-0004	Not Answered	Terry	Clarke		Not Answered	THUN3	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	Add North West Thundersley site, reduce the urban housing target by half, remove the Thun3A Thundersley Clinic site from the local plan.	No	Not Answered		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

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	
											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. 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									

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											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-provided the same service elsewhere in the Thundersley area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, 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.								

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1066-0001	Individual	Sheila	Clarke		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, 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 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	Add North West Thundersley site, reduce the urban housing target by half,	No	Not Answered	Not Answered		North West Thundersley No five year housing land supply Doesn't meet housing target Green/Grey Belt 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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											us the housing numbers required, and we can reduce the over development of our urban sites.							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.	

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1066-0002	Not Answered	Sheila	Clarke		Not Answered	HAD3	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. 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	Add North West Thundersley site, reduce the urban housing target by half, remove the Had3 Hadleigh Clinic site from the local plan.	No	Not Answered			Objecting to HAD3 because: Accessible clinic should not be removed	Policy HAD3 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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											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, 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-provided the same service elsewhere in the Hadleigh area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, 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								

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											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.								
1066-0003	Not Answered	Sheila	Clarke		Not Answered	HAD4	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. 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	Add North West Thundersley site, reduce the urban housing target by half, revise Scrub Lane development to 20 homes.	No	Not Answered			Objecting to HAD4 because: density	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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											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 the houses								

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											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.								
1066-0004	Not Answered	Sheila	Clarke		Not Answered	THUN3	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	Add North West Thundersley site, reduce the urban housing target by half, remove the Thun3A Thundersley Clinic site from the local plan.	No	Not Answered			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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											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. 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									

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											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-provided the same service elsewhere in the Thundersley area, and we have no local health hub. This local plan is just picking ludicrous sites to fulfill its over development urban brownfield only site selection policy, which unbelievably used AI for that site selection. With reference to the Infra3 Policy, 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.									
1067-0001	Individual	Sam	Calvert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N	

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1068-0001	Individual	Max	Calvert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1069-0001	Individual	Julia	Huckle		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1070-0001	Individual	Kerry	Hallett		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	The amount of local traffic this development will create is unreasonable and not sustainable. The area is already over populated and under serviced with local amenities. Traffic is already excessive between hadleigh and leigh on sea. The pollution created from this standing and constantly queueing traffic is unreasonable. Local services and doctors surgeries are over subscribed already. What was once a lovely place to live is being ruined by excessive building and a complete lack of additional local services to support this rapidly growing population.	Significant reduction in number of residences to be applied to this development.	No	Not Answered	Not Answered		Objecting to HAD4 because: Traffic Infrastructure Air quality	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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N

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																		Air Quality Air quality impacts are assessed in the Sustainability Appraisal, 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. Castle Point 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	

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																		points across the Borough suggest that air quality is improving.	
1071-0001	Individual	paul	smith		Yes	SP3	No	draft local plan is unsound due to only accounting for half of the housing required by the government. It needs to add the full amount of required housing and add the NW Thundersley site for this additional housing.	No	Consistent with national policy	draft local plan is unsound due to only accounting for half of the housing required by the government. It needs to add the full amount of required housing and add the NW Thundersley site for this additional housing.	draft local plan is unsound due to only accounting for half of the housing required by the government. It needs to add the full amount of required housing and add the NW Thundersley site for this additional housing.	No	Not Answered	Not Answered		Not meeting the housing target North West Thundersley	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	N

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																		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 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. 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.	

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1072-0001	Individual	Harry	Engl and		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, 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	Add North West Thundersley site, reduce the urban housing target by half.	No	Not Answered	Not Answered	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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											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 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	

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
																		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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1072-0002	Not Answered	Harry	Engl and		Not Answered	C7	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, 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. 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.	Add North West Thundersley site, reduce the urban housing target by half, Dredge Canvey Lake !!	No	Not Answered		A	Supports Policy C7 - Canvey Lake Wants the lake to be dredged	Support noted.	N

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											I do agree with Policy C7 about improving the Canvey Lake. This needs to deliver an increased capacity of the Lake from dredging for flood water storage, reduce the flood risk, a long-term management plan of the lake, improve and maintain water quality, 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. I concur with the many statements made within this policy, that Canvey Island suffers from high levels of surface water flood risk, and with higher rainfall Canvey Lake becomes an important depository for excess rainwater, poor water quality is unsafe for users, animals and biodiversity to thrive, we need to further improve this natural environment, and how surface water runoff contaminates should be managed, the Canvey Island 6 Point Plan was undertaken in 2015, about Canvey and recommended the capacity of the lake should be investigated and								

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											achieved through to provide additional storage capacity, and that Canvey Lake acts as a habitat to many different wildlife, including waterbirds and some aquatic life with the risks to wildlife due to the water quality. This is the vision we need for Canvey Lake.								
1073-0001	Individual	Richard	Revell		Yes	HAD4	Yes		No	Positively prepared, Justified	Hadleigh is already overcrowded, with significant traffic down Scrub Lane following the development of Scrub Lane Mews. During school runs, Scrub Lane is reduced to a single lane road. There are no resources within Hadleigh for additional population. It is not appropriate to house persons with complex needs so close to schools / parks / playgrounds.	I would suggest first increasing resources within Hadleigh as well reviewing the traffic flow.	No	Not Answered	Not Answered	A	Objecting to HAD4: Traffic Infrastructure Location of homes for people with complex needs next to the school	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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the	N

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1075-0001	Individual	Karen	Miller		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1076-0001	Individual	Lydia	Miller		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1077-0001	Individual	Veronica	Greenwood		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1078-0001	Individual	Samantha	Netherton		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1079-0001	Individual	Malcolm	Brown		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1080-0001	Individual	Victoria	Sullivan		Yes	Consultation	No	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the consultation document. I think this is a	No	Positively prepared	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the consultation document. I think this is a construct to	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the consultation document. I think this is a construct to	No	Not Answered	Yes	A	Consultation too long to detract responses	A summary document was also provided but it is a legal requirement to consult on the whole document.	N

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								construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?			make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?	make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?							
1081-0001	Individual	Daniel	Sullivan		Yes	SP3	No	This process for objection and the very long document and form for objection is too unwieldy for the average person. You are not enabling your population to be able to voice their opinions and objections easily. This approach lacks accessibility and isn't inclusive.	No	Positively prepared, Effective, Justified	Objection to Proposed Housing Development on Canvey Island I am writing to formally object to the proposed housing developments on Canvey Island as part of the Castle Point Local Plan. While I understand the need for housing nationally, I believe this proposal is deeply unsuitable for Canvey Island for the following reasons: 1. Unsustainable Infrastructure and Access Canvey Island has only two access roads, both of which are frequently congested. During peak hours, weekends, or in the event of an accident, the island becomes gridlocked. The Waterside Farm roundabout is a known choke point, and additional housing will only increase traffic volumes, making daily life more difficult and potentially dangerous in emergencies. 2. Overpopulation and Pressure on Services Castle Point is already one		No	Not Answered	Yes		Lack of inclusivity on the consultation Traffic concerns Flood risk on canvey Lack of opportunities for over 16 education Lack of investment in people	Consultation 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. 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,	N

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											of the most densely populated areas in the country. Adding more homes will place further strain on already overstretched public services, including healthcare, schools, and social care. Crucially, Castle Point Borough Council does not have commissioning responsibility for these services, meaning there is no guarantee that the necessary infrastructure will be delivered alongside the housing. 3. Flood Risk and Environmental Concerns Parts of Canvey Island are located on flood plains, and the island has a history of flooding, including serious incidents in recent years. Building more homes in these areas is irresponsible and puts future residents at risk. It also increases the burden on flood defences and emergency services. 5. Lack of Opportunity and Educational Provision Canvey Island already suffers from limited access to further and higher education. There are no colleges or universities on the island, and the only local post-16 provision is limited in scope. Young people must travel off-								have prepared the Essex Local Transport Plan 4, which within the Implementation Plan for South Essex includes wider local improvements to transport 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. 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 the borough, including on Canvey, but aim	

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											island to access a broader range of courses, which is a barrier—especially for those from lower-income families. Castle Point ranks poorly in national opportunity indices, and Canvey Island in particular has lower educational attainment and life expectancy than the mainland. Building more homes without investing in education, skills, and opportunity will only deepen existing inequalities. 6. No Investment in People This plan focuses on physical development without addressing the needs of the population. There is no parallel investment in education, transport, or economic opportunity. We risk creating a larger population with fewer prospects, worsening outcomes for current and future residents. Conclusion Canvey Island is not a suitable location for large-scale housing development. The island’s infrastructure, geography, and socio-economic challenges make this proposal unsustainable and potentially harmful. I urge the council to reconsider and instead														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. Over 16 education Policy E3 - development of local skills has been included to ensure that education and skills are invested in. Lack of investment in people The objectives of the castle point plan as set out on page 18 have	

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											focus on improving opportunity, education, and quality of life for existing residents before expanding the population further.							people at the heart of them addressing environment, economic and social impacts.	
1081-0002	Individual	Daniel	Sullivan		Yes	C4	No	This process for objection and the very long document and form for objection is too unwieldly for the average person. You are not enabling your population to be able to voice their opinions and objections easily. This approach lacks accessibility and isn't inclusive.	No	Positively prepared, Effective, Justified	4. Loss of Employment Land The proposed development in the Charfleets area threatens to displace local businesses and reduce employment opportunities. This land is currently designated for employment use and plays a vital role in supporting the local economy. Replacing it with housing undermines long-term economic sustainability.		No	Not Answered	Yes		Objecting to C4 due to loss of jobs and employment space on charfleets	Policy C4 includes an increase of 10% commercial floorspace and will not result in the loss of commercial space.	N

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1082-0001	Individual	Natasha	Ayleen		Yes	HAD4	Yes		No	Positively prepared	The infrastructure surrounding Scrub lane in particular the junction with Rectory Road and New Road cannot accommodate additional traffic this development would cause. With two schools in close proximity and already in adequate parking for safe drop off and collection of children this will also cause safety issues. The building of this development also does not fit in with the current build of Scrub Lane. The build removes green space for young children learning. The outdoor space should be utilised for exercise which promotes a healthy lifestyle. It also allows team sports to take place whether these are school sports or outside organisations. We cannot take this away from our future generation by building homes which are simply not practical to the infrastructure.		No	Not Answered	Not Answered		Objects to HAD4 because: Density Traffic Infrastructure Proposal contradicts objective 19 due to loss of a playing field 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details	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
																		Policy HAD4 requires suitable mitigation for the loss of the playing field facility in accordance with objective 19	
1083-0001	Individual	Derrek	Parker		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1084-0001	Individual	Sue	Tomline		Yes	SP3	No	The infrastructure cannot cope with the number of houses already in the area. The schools , doctors are at capacity. The roads cannot cope with the additional traffic	No	Consistent with national policy	The plans are a tick box exercise to comply with government targets with no thought of improving the infrastructure to support it	The people of Castle Point deserve better our infrastructure cannot cope as it is. The environmental costs outweigh any out of touch government target	No	Not Answered	Not Answered		Infrastructure concerns Traffic Concerns	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	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. 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
																		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 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.	
1085-0001	Individual	Suzanne	Zammit		Yes	ENV 1	Yes		No	Positively prepared	There should be more care to protect trees by putting TPOs on all oaks in the areas where building may take place so that we do not lose these precious old trees and so that we preserve Green spaces and biodiversity	There should be more care to protect trees by putting TPOs on all oaks in the areas where building may take place so that we do not lose these precious old trees and so that we preserve Green spaces and biodiversity	Yes	Not Answered	Not Answered		More care to protect trees by putting TPOs on all oak trees	Comments noted.	N

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1086-0001	Individual	Jos hua	Marsh		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	I am writing to formally object to Policy Had4 as set out on page 73, paragraphs 10.27–10.31. 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 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		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Infrastructure Density Protect the trees on site Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N	

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											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 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.								Safeguarding the trees will be done so at planning application stage	

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1087-0001	Individual	Lauren	Marsh		Yes	HAD4	Yes		No	Positively prepared, Effective, Justified, Consistent with national policy	am writing to formally object to Policy Had4 as set out on page 73, paragraphs 10.27–10.31. 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 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		No	Not Answered	Not Answered		Objects to HAD4 because: Traffic Infrastructure Density Protect the trees on site Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details 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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	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. Wh y?	Sup porti ng Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d						
											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 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.													Safeguarding the trees will be done so at planning application stage	
1088-0001	Individual	Chelsea	Howell		Yes	HAD4	No	No notice given to roads that will be affected by this housing, I.e. a lot more traffic on the road, less likely to get an appointment in the doctors surgery. Just want to make you all aware of the high impact building more houses in Hadleigh will have on	No	Positively prepared		To not use this land, or any land in Hadleigh for housing. I moved here to be away from the busyness, and would hate for it to become like any other town where it's overrun with people and cars.	No	Not Answered	Not Answered	B	Objects to HAD4 because: Traffic Infrastructure Density Don't build on salvation army land	Density The density chosen for this site was informed by the Density and Capacity Study July 2025, please see this for further details Traffic 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. Why?	Sup port ing Evid enc e sup plie d?	Opt ion A, B or C	Summary	Officer Response	Mods Require d			
								traffic, school places, doctor surgery places, and the safety of this area. I moved from an area that was starting to go downhill, we chose Hadleigh because it's safe, quiet and it's a lovely area to bring my baby up in. We take walks over to the Castle and the Salvation army land and would hate to see that land go to waste by more houses being built for no reason. I'm not sure if this is the correct way to voice my opinion, nonetheless, I hope you take this into consideration.													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. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). The salvation army land is allocated green belt and is not included for development within this plan	
1089-0001	Individual	Volodymyr	Shkuratov		Yes	Whole Plan	No	Please do not allow building on thr green belts	Yes				Not Answered	Not Answered	Not Answered		No building on greenbelts	No Green Belt has been allocated within this Castle Point Plan	N			

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													ere d						
1090-0001	Individual	Christine	byrne		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1091-0001	Individual	Tessa	Church		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1027-0005	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	ENV 1	Yes		No	Consistent with national policy	Paragraph 2 of Policy ENV1 refers to 'protect'; however, this is not aligned with national policy. Paragraph 187 of the NPPF states that planning policies and decisions should 'contribute to and enhance the natural and local environment' by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). The list of features covered in paragraph 2 are not such designated sites or features. Paragraph 188 of the NPPF states that plans should: distinguish between the hierarchy of international, national and locally designated sites. The policy should do this.	Policy ENV1 is not Sound as it is not consistent with the NPPF. It should be amended accordingly – 'Development proposals should seek to minimise harm and where practicable enhance key natural/ semi-natural and historical features'.	No	Not Answered		A	Paragraph 2 of Policy ENV1 refers to 'protect'; however, this is not aligned with national policy. Paragraph 187 of the NPPF states that planning policies and decisions should 'contribute to and enhance the natural and local environment' by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). The list of features covered in paragraph 2 are not	Noted	N

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											Policy ENV1 is not Sound as it is not consistent with the NPPF. It should be amended accordingly – ‘Development proposals should seek to minimise harm and where practicable enhance key natural/ semi-natural and historical features’.						such designated sites or features. Paragraph 188 of the NPPF states that plans should: distinguish between the hierarchy of international, national and locally designated sites. The policy should do this. Policy ENV1 is not Sound as it is not consistent with the NPPF. It should be amended accordingly – ‘Development proposals should seek to minimise harm and where practicable enhance key natural/ semi-natural and historical features’		
1092-0002	Not Answered	Una	Kipps		Not Answered	HAD4	Yes		No	Justified	When the field was divided in the 1990s, it was always agreed that the remaining school playingfield would have long-term vehicle access from Scrub Lane, for when the Junior School, currently between Church Road and The Avenue, would be rebuilt on the land adjacent to the Infant and Nursery school. There is no mention of retaining vehicular access from Scrub Lane in this plan,	Include vehicular access to the Junior School field on that site.	No	Not Answered			Objecting to HAD4 because: Keep vehicular access to the junior school from scrub lane to enable future development of the school site No infrastructure delivery Traffic	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	N

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											which would inevitably reduce the number of homes which could be built on the land in question. Not to include that access precludes any future development along those lines, which is ridiculously short-sighted. And Scrub Lane cannot accommodate such increased traffic as this development proposes: at certain times of day it can take 4 or more changes of traffic lights to cross the Rectory Rd / New Rd /Scrub Lane junction. Without an Infrastructure Plan in place, the quality of life of local people will deteriorate markedly from all this intensive building.							sufficient highway impact mitigation. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1092-0003	Not Answered	Una	Kipps		Not Answered	HA D1	Yes		No	Justified	Accessibility in relation to parking and 'Urban first' approach. If the council really wanted to enhance community facilities, it would be considering replacing one of the community halls lost in recent years, and maybe the British Legion site could be developed as a community facility with accompanying parking at ground level and flats above. But the total loss of that car park would be detrimental to the south side of Hadleigh and potentially could further reduce church attendance and therefore viability. The		No	Not Answered			Don't build on the car park in hadleigh due to loss of car parking for people accessing the church	The development of the castle lane car park will be done in conjunction with the coordination of parking provision in the town centre to consolidate parking arrangements.	N

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											council needs to consider the knock-on effect of its proposals, and I see little evidence of that at present.								
1092-0004	Not Answered	Una	Kipps		Not Answered	HAD3	Yes		No	Effective	I see nothing to indicate that there is any realistic proposal on the table for provision of alternative clinic facilities. In the plan for Hadleigh town centre which we worked on with CPBC ten years ago, there was provision for both the Library and a clinic in a new community hub in the centre of the island-site, which could have worked well. But the only recent additional NHS facility in Hadleigh is in the ground floor of a new-build right on the single-carriageway A13 (near Meadow Rd) where there is no layby for a taxi to pull over to unload a wheelchair user, and no appropriate parking nearby. All these authorities need to get real about the ageing population they serve (just count the quantity of sheltered housing & nursing homes already in the area) and bring these schemes together as clear jointly-agreed proposals before committing to building additional homes on sites currently serving the community.		No	Not Answered			Objects to HAD3 due to loss of NHS facility and lack of plan to replace	Policy HAD3 specifically states that the site will only come forward once reassurance has been provided from the NHS that the building is surplus to requirements and that the services provided currently can be provided elsewhere.	N

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1093-0001	Individual	Michaela	Green		Yes	HAD4	No		No		No more flats! Over looking an infant school	No more flats overlooking children	No	Not Answered	Not Answered		Objecting to HAD4 because: No flats Overlooking School	"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. Close proximity to the school Chapter 16 - achieving well designed places will ensure that enough space is provided between the dwellings and the school playing field to safeguard school children and residents."	N
1094-0001	Individual	Claire	Brown		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1095-0001	Individual	Laura	Brady		Yes	Whole Plan	Yes	All green belt should be protected, the infrastructure of this area is at full capacity	Yes	Positively prepared			Not Answered	Not Answered	Not Answered	A	Protect all greenbelt Infrastructure	GreenBelt is not allocated within the Castle Point Plan	N

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													ered					Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	
1096-0001	Individual	Gary	Lan glois		Yes	SP3	No	There is no provision for the infrastructure on the island for all the vehicles that theses developments will bring. Clearly there has been no thought put into the plan at all. There is no room for anymore homes this end of the country period!	No	Justified	Infrastructure!	Scrap the whole idea, NO MORE BUILDING! Including a third exit off!	Yes	Not Answered	Not Answered		Infrastructure	Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP).	N
1027-0006	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	ENV3	Yes		No	Effective, Justified	Paragraph d (ii) of Policy ENV3 is not national guidance. Paragraph: 006 Reference ID: 74-006-20240214 of the PPG 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	Amended to minimum 10% BNG. To justify such policies for 20% 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.	Yes	Not Answered		A	Objects to BNG 20% requirment and the evidence for it.	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,	N

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											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. It is noted that Essex County Council have commissioned work on the 20% BNG, but there should be a local assessment undertaken to support such a policy in the local plan. Policy EN3 is not Sound as it is not effective or justified and should be amended accordingly.							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'.	
1098-0001	Individual	June	Fordham		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered	A	Castle Point Plan is sound and legally compliant,	Support noted.	N
1099-0001	Individual	Max	Calvert		Yes	Whole Plan	Yes		Yes				Not Answered	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1100-0001	Individual	Gareth	Howlett		Yes	Whole Plan	Yes		Yes				No	Not Answered	Not Answered		Castle Point Plan is sound and legally compliant,	Support noted.	N
1101-0001	Duplicate representation received . See represent																		

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	ation 1068-0001.																		
1102-0001	Duplicate representation received. See representation 0817-0001.																		
1103-0001	Not Answered	Victoria	Sullivan		Not Answered	SP3	No	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts of the consultation document. I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?	No	Positively prepared	Objections to the Proposed Housing Development in Castle Point – Focus on Canvey Island Part 1: Main Objections 1. Severe Access and Traffic Issues Canvey Island already suffers from significant traffic congestion, particularly during rush hours and weekends. The island becomes gridlocked when incidents occur on or near the main access routes. The Waterside Farm roundabout is a known bottleneck, and additional housing will inevitably increase the number of vehicles, worsening an already overburdened road network. 2. Overpopulation and Density Castle Point is already one of the most densely populated areas in England. According to your own consultation report, in 2021 there were 14.3		No	Not Answered			Transport Development is too dense Infrastructure Flood risk on Canvey Further education on Canvey	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 networks in and around Castle	N

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											people per football pitch-sized piece of land, up from 14.1 in 2011. This places the borough in the top 30% of the most densely populated local authorities in the country. Adding more housing will only intensify this pressure. 3. Strain on Public Services Each new home is likely to house multiple residents, increasing demand on schools, healthcare, social care, and other essential services. However, Castle Point Borough Council does not commission or control these services, meaning there is no guarantee that the necessary infrastructure will be provided to support population growth. 4. Flood Risk Some of the proposed housing is planned on flood-prone land. Canvey Island has experienced flooding in the past decade due to inadequate infrastructure, and its history includes the devastating floods of the 1950s. Building on flood plains is irresponsible and puts future residents at risk. Part 2: Education and Opportunity 1. Low Opportunity and Social Mobility Castle Point ranks 390 out														Point, including improved linkages to other areas. Growth in Castle Point will facilitate the delivery of the proposals in the Local Transport Plan 4. Dense Development The council has taken an urban first approach to development which is aligned with national planning policy. Densities prescribed are based on the density and capacity study which is available to view on the website. Infrastructure Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure Delivery Plan (IDP). Flood Risk on	

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											of 533 in the Sutton Trust Opportunity Index, which measures access to opportunity based on education, employment, and socio-economic background. This reflects a serious lack of access to high-quality jobs, education, and skills training—particularly on Canvey Island. 2. Lack of Local Employment Opportunities There are few high-quality jobs with progression opportunities in Castle Point. The consultation report notes that 98% of local businesses are micro or small enterprises, which typically lack the capacity to offer apprenticeships or career development. This forces residents to commute off-island, further straining the limited transport infrastructure. 3. Transport as a Barrier to Opportunity Canvey Island’s geography and limited transport links restrict access to education and employment. Research from Parliament and the Local Government Association shows that poor transport infrastructure significantly limits economic inclusion. Young people from lower-income backgrounds are particularly affected, as							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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											the cost and complexity of travel can prevent them from pursuing further education or training. 4. Inadequate Further and Adult Education Provision There are no further education institutions on Canvey Island. The Xtend campus offers limited higher education options, primarily in early years education, which lacks diversity and does not meet the needs of all young people—particularly boys or those interested in trades or academic pathways. While some provision exists in Benfleet (USP College, King John, Appleton), travel remains a barrier. Adult education is also severely lacking. Castle Point has no responsibility for education, which falls under Essex County Council. This disconnect means that planning for new housing does not automatically include planning for the educational needs of the population. 5. Educational Underperformance Only 20% of students in Canvey Island’s secondary schools achieved a grade 5 or above in English and Maths last year. Progress 8 scores—used to measure student progress—are								Canvey. Further education on Canvey Policy INFRA2 seeks to safeguard and encourage further education	

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											significantly below the national average. This indicates that young people are not receiving the quality of education needed to succeed, perpetuating cycles of disadvantage and inequality. 6. Health and Socioeconomic Inequality While overall life expectancy in Castle Point is in line with national averages, there are stark disparities between Canvey Island and the mainland. In 2022–23, 20.5% of under-16s in Canvey lived in relative low-income families. These inequalities are compounded by poor educational outcomes and limited access to opportunity. Conclusion While infrastructure concerns are often raised in response to housing developments, the issues facing Canvey Island go far deeper. The proposed developments risk worsening existing inequalities and placing unsustainable pressure on services that the borough does not control. There is investment in housing, but no parallel investment in the people who live here. We are creating a perfect								

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											storm: more people, fewer opportunities, and no clear plan to address the underlying issues. Canvey Island residents deserve better. They deserve access to good jobs, quality education, and a future they can aspire to. Building more houses without addressing these fundamental challenges will only deepen the divide.								
1103-0002	Not Answered	Victoria	Sullivan		Not Answered	C4	No	I understand that a consultation has to be robust and relevant evidence and documentation provided, but the 230 page document, and overly complicated form (this form) are too complex for the average person, this includes the fact that you are asking people to reference different parts	No	Positively prepared	5. Loss of Employment Land The Charfleets area, earmarked for housing, is currently designated for employment. Replacing this with residential development risks the loss of local jobs and undermines the economic sustainability of the island.		No	Not Answered			Policy C4: Concerned about loss of jobs	Policy C4 includes an overall increase in industrial floor space of 10% and therefore will not result in a loss of employment	N

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								of the consultation document. I think this is a construct to make it too difficult so people do not bother to object. How is the average person to know if the consultation is sound or legally compliant?											
1104-0001	Individual	Darren	Thipton			SP3	No	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. Also, significantly there are effectively only three highways access routes in and out of the 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	No		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 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	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.					Flood risk Infrastructure capacity Flood risk on canvey Highway infrastructure Supports protection of the greenbelt North west thundersley Lack of five year housing land supply Lack of duty to cooperate Evidence for not meeting housing numbers	Flood risk The Strategic Flood Risk Assessment provides an overview of flood risk within Castle Point and then provides site specific information for the allocations in the Castle Point Plan and provides recommendations on how to address any flood risk arising through development. Infrastructure capacity Infrastructure matters (including healthcare and education) are covered by policies INFRA1-6 and the supporting Infrastructure	N

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								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,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 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			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. 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									Delivery Plan (IDP). 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 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	

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								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 the consultations on the Plan well-advertised, I 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 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 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, Tidal Flood Risk, Hazardous Industries and infrastructure constraints. * The Council’s removal of several Green Belt sites is commendable and reflects			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. 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								form of the SFRA and IDP, including in relation to Canvey. Highway infrastructure 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 networks in and around Castle Point, including improved linkages to other areas. Growth in Castle Point will	

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								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 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. 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			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 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								facilitate the delivery of the proposals in the Local Transport Plan 4. Supports protection of the greenbelt 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	

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								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 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.			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 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								not preferred. Lack of 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 provide a rolling	

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											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 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. 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. The reliance on inadequate traffic routes to the Proposed Canvey West development, Haven								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. For further	

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											Road, Northwick Road and Roscommon Way, all 3 filtering out onto Canvey Road at the Dutch Village area will lead to increased and unacceptable congestion and pollution. 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 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												information please see housing topic paper. Lack of duty to cooperate supporting Statements of Common Ground. The Council has worked collaboratively with all to ensure that the Duty to Cooperate has been met. Evidence for not meeting housing numbers 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	

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											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, as demonstrated on Canvey Island during the 2013 and 2014 Summer flooding events, 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 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								2025. While the Plan does not meet the standard method housing requirement, this does not automatically mean that it is not sound. A sound plan must be based on a robust and credible evidence base and reflect the realities and constraints of the area. The proposed housing figure is justified by robust evidence which the Council will set out during the examination.	

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											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 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								

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											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 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								

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											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, 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								

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											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 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								

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											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. As a Resident of Castle Point, I find the format of the CPBC Plan Regulation 19 makes it difficult for me to engage with, therefore I trust that my use of this format will not make it impossible for my views to be accepted. Previously the original Local Plan 2011, was rejected by the Examining Inspector, due to reliance of Land on Canvey Island so as to protect the Mainland’s Green Belt. The Inspector found that approach totally unacceptable due to the Flood Risk issue. This latest								

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											version of the Plan, some 14 years later, indicates Castle Point Borough Council relying on land in a Flood Risk zone3 at Canvey Island are content to make the same mistakes of old! With the right 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. I strongly urge Castle Point Borough Council to modify the Plan before submission to the Planning Inspectorate.								
1104-0002	Individual	Darren	Thiptorpe			For word	No	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	No								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	N

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								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.										Cooperate has been met.	
1105-0001	Individual	Mr	Sammons			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 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 e.g. Greenbelt / Grey Belt 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.	No five year housing land supply				A	Doesn't meet the housing target Flood risk on Canvey Third road Infrastructure	Doesn't meet the housing target 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. While the Plan does not meet the standard method housing	N

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											Other examples of Canvey not being a viable alternative location are: Road network is already strangled by high volumes of traffic, in particular during rush hour periods. To address this would not only require the much needed third road being built but a major reworking of the existing routes so that they do converge at Waterside roundabout and more lanes being added. Also Sadlers farm roundabout was poorly designed as the route off the A13 is only 2 lanes and therefore includes traffic going to North and South Benfleet and the traffic going to Canvey has to sit in a queue and then negotiate 2 sets of traffic lights before getting onto a Canvey Way (aka Remembrance Avenue) which is only a single land road. The health care is also already stretched and without additional Doctors/Dentists etc would not be able to provide adequate care for the residents. Investment would require to be made in additional schools in particular another secondary school would be essential, as the demolition of Furtherwick Park school to facilitate the relocation of Castleview School reduced								requirement, this does not automatically mean that it is not sound. A sound plan must be based on a robust and credible evidence base and reflect the realities and constraints of the area. The proposed housing figure is justified by robust evidence which the Council will set out during the examination. 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 the borough, including on Canvey, but aim	

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											this from 3 to 2. Has the bus and train routes been considered as with this number of additional residents commuter routes will become overcrowded and potentially unusable? This list is by no means exhaustive but a mere example of some of the issues that will require to be considered before approving the proposed plan.							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 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	

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																		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 the Castle Point Plan will make a contribution to relevant	

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																		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).	
1105-0002	Individual	Mr	Sammons			C4	No	Canvey West homes puts residents in the East at risk with emergency evacuation procedures.	No	Not Stated						A	Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1027-0007	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	ENV 6	Yes		No	Positively prepared, Justified	Paragraph 188 of the NPPF states that plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. In the footer a specific comment is added that where significant development of agricultural land is demonstrated to be necessary, areas of poorer	see above	No	Not Answered		A	Paragraph 188 of the NPPF states that plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. In the footer a specific comment is added that	Noted. There are significant areas of Grade 4 in Castle Point.	N

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											quality land should be preferred to those of a higher quality. All of the agricultural land in the Borough is Grade 3 and no detailed assessment has been undertaken of the agricultural quality of the land in the Borough, beyond the Agricultural Land Classification Maps, to establish whether any is grade 3a. In these circumstances, and given the significant need to allocate land for housing, the application of the 'precautionary principle' to agricultural land is not justified. Policy ENV6 is not Sound, as it is not justified and not positively prepared						where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. All of the agricultural land in the Borough is Grade 3 and no detailed assessment has been undertaken of the agricultural quality of the land in the Borough, beyond the Agricultural Land Classification Maps, to establish whether any is grade 3a. In these circumstances, and given the significant need to allocate land for housing, the application of the 'precautionary principle' to agricultural land is not justified. Policy ENV6 is not Sound, as it is not justified and not positively prepared		

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1027-0008	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	T2	Yes		No	Consistent with national policy	Point 7 of Policy T2 states that the Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions. However, paragraph 116 of the NPPF states 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. Policy T2 is not Sound as it is not consistent with the NPPF. It should be amended to refer to an 'unacceptable' impact and where cumulative impacts on the road network 'would be severe'.	Policy T2 is not Sound as it is not consistent with the NPPF. It should be amended to refer to an 'unacceptable' impact and where cumulative impacts on the road network 'would be severe'.	No	Not Answered		A	Point 7 of Policy T2 states that the Council will resist development that would impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions. However, paragraph 116 of the NPPF states 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. Policy T2 is not Sound as it is not consistent with the NPPF. It should be amended to refer to an 'unacceptable' impact and where cumulative impacts on the	Comments noted, please see modifications added.	7. The Council will resist development that would cause unacceptable impact on the effective operation, safety or resilience of the A13, A127 or A130, or associated junctions or where cumulative impact on the road network would be severe.

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																	road network 'would be severe'.		
1027-0009	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	SD2	Yes		No	Consistent with national policy	Policy SD2 will need to be updated, regarding the sequential test, following the recent update to the PPG (dated 17.09.25).	Policy SD2 will need to be updated, regarding the sequential test, following the recent update to the PPG (dated 17.09.25).	No	Not Answered		A	Policy SD2 will need to be updated, regarding the sequential test, following the recent update to the PPG (dated 17.09.25).	Noted. Statements of Common Ground undertaken with Environment Agency and ECC (Lead Local Flood Authority). The LPA will ask the Examining Inspector to recommend any mods which they believe are necessary for soundness.	N

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1027-0010	Agent	c/o agent	c/o agent	Taylor Wimpey	Yes	SD4	Yes		No	Justified, Consistent with national policy	Taylor Wimpey is in general support of progress towards the Future Homes standard and net zero ready housing. This is in the context of the NPPF (para 161) which is clear that ‘the planning system should support the transition to net zero to 2025.’ However, Policy SD4 is not sound on the basis that it goes beyond national standards and requirements in building regulations and there does not appear to be robust justification for this. As the Council will be well aware, the technology of net zero ready housing remains at an early stage, and is being worked through at both the national level, by the government, and through the planning and operational stages of emerging developments, by the housebuilding sector and Local Planning Authorities. New build homes in the UK are already built to high energy efficiency standards, and the forthcoming Future Homes Standard (FHS) will provide a consistent, nationally regulated framework that supports scalable delivery	see above - overall, Policy SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements (consistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.	No	Not Answered		A	Taylor Wimpey is in general support of progress towards the Future Homes standard and net zero ready housing. This is in the context of the NPPF (para 161) which is clear that ‘the planning system should support the transition to net zero to 2025.’ However, Policy SD4 is not sound on the basis that it goes beyond national standards and requirements in building regulations and there does not appear to be robust justification for this. Objects to this policy on the following basis: • The energy levels stated in ‘Requirement 1’ seem to align with Passivhaus standards which require (inter alia) an airtight building and are above the requirements of building regulations (which is a challenge in particular for	Noted	N

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											of low-carbon housing. For volume developers, this consistency is critical, it enables streamlined design, procurement, and construction processes while avoiding the complexity and constraints associated with bespoke standards such as or equivalent to Passivhaus. FHS offers a pragmatic pathway to decarbonisation that balances performance with buildability, supply chain resilience, and placemaking flexibility. It is important that Local Authorities (LA) should not independently set standards that deviate from the requirements outlined in the building regulations. Building regulations are established at a national level to ensure consistency, safety and compliance across the country. LA's are responsible for enforcing these regulations and can provide guidance or supplementary requirements specific to local conditions, but these should align with national standards to ensure clarity, consistency and certainty. TW therefore objects to this policy on the following basis: • The energy levels stated						volume housebuilders, as above). • The energy use intensity limits in ‘Requirement 3’ are too onerous and are not aligned to national requirements (building regulations). Stringent EUI targets restrict flexibility in design. This can compromise placemaking, reduce density, and limit the ability to respond to local character or market preferences. • ‘Requirement 4’ seeks that renewable energy must be generated on-site for all new developments – however, forthcoming building regulations will mandate PVs and the levels stated in the policy, are unlikely to fit on standard residential roofs. It is noted that the policy includes the flexibility where this requirement is			

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											in ‘Requirement 1’ seem to align with Passivhaus standards which require (inter alia) an airtight building and are above the requirements of building regulations (which is a challenge in particular for volume housebuilders, as above). • The energy use intensity limits in ‘Requirement 3’ are too onerous and are not aligned to national requirements (building regulations). Stringent EUI targets restrict flexibility in design. This can compromise placemaking, reduce density, and limit the ability to respond to local character or market preferences. • ‘Requirement 4’ seeks that renewable energy must be generated on-site for all new developments – however, forthcoming building regulations will mandate PVs and the levels stated in the policy, are unlikely to fit on standard residential roofs. It is noted that the policy includes the flexibility where this requirement is not ‘technically feasible’ then there is the opportunity for offset payments. This general approach is supported; however, as above – such calculations can have a large impact on						not ‘technically feasible’ then there is the opportunity for offset payments. This general approach is supported; however, as above – such calculations can have a large impact on development viability. • Further, TW would question the evidence base behind ‘Requirement 5’ which requires that ‘In-use energy monitoring is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation.’ Further, it is not clear what constitutes “as-built performance” - the policy needs to be clear what is being proposed to prevent inconsistent interpretation. Adding further as-built requirements risks duplication, increasing cost and		

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											development viability. • Further, TW would question the evidence base behind ‘Requirement 5’ which requires that ‘In-use energy monitoring is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, for the first 5 years of operation.’ Further, it is not clear what constitutes “as-built performance” - the policy needs to be clear what is being proposed to prevent inconsistent interpretation. Adding further as-built requirements risks duplication, increasing cost and administrative burden without clear added value. Further, with regard to part b - requiring in use energy monitoring on 10% of dwellings in large developments could raise challenges around both GDPR compliance and consumer acceptance. Overall, Policy SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements (cosnistent with national policy). The Policy must be robustly tested for practicability,						administrative burden without clear added value. Further, with regard to part b - requiring in use energy monitoring on 10% of dwellings in large developments could raise challenges around both GDPR compliance and consumer acceptance. Overall, Policy SD4 should be carefully reviewed and re-drafted so that the requirements are brought in line with building regulations and national requirements (cosnistent with national policy). The Policy must be robustly tested for practicability, deliverability and feasibility.		

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											deliverability and feasibility.								
1107-0001	Sue	Jackson				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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																		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 of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space	

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																		Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
1107-0002	Sue	Jackson				SP3			No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						The Castle Point is not consistent with national policy as it does not meet the standard methodology housing target. Considers that there is overdevelopment in urban areas particularly on Canvey Island and that Green Belt Sites should have been allocated for development instead.	The Castle Point Plan is underpinned by an evidence base including a Green Belt Assessment based on government guidelines and a housing topic paper which considered further criteria including impact on designated sites, transport and environmental impacts including flood risk. The evidence supported the regeneration and densification of urban sites	N
1107-	Sue	Jackson				C4					Canvey West homes put residents in the East at risk						Development at Canvey west impacts emergency	Castle Points resident's safety is a priority to the	N

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0003											with emergency evacuation procedures.						evacuation procedures for residents at Canvey East	Council and has been considered within the Castle Point Plan	
1108-0001	Vickey	Starky				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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																		plan was withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	

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1108-0002	Vickey	Starkely				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families. As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.													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.	
1108-0003	Vickey	Starkely				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	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
																	those residents living at East Canvey	within the Castle Point Plan	
1109-0001	Robert	Martin				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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																		withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	
1109-0002	Robert	Martin				SP3		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	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.						Objects to the level of development proposed at Canvey Island as it would impact on the access routes on and off the island, particularly during an emergency evacuation.	The Castle Point Plan considers improved access to Canvey Island in Policy C5 to support the proposed development. The Public Consultation included drop in	N

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								third road off the island. As you must be aware we 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. 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 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			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.							Considers that residents with limited digital access had limited access to the public consultation. Considers that the Castle Point Plan is not consistent with national policy as it delivers less houses than the standard methodology housing target. Considers that more Green Belt sites should have been allocated.	events on Canvey Island on 20th August, 22nd August, 18th September and 25th September, residents could provide their responses either during the event or via postal letter. The Council has considered its housing strategy carefully and what can realistically be achieved within its boundaries taking into account its environmental and physical constraints. This has been based on evidence from the Green Belt Assessment, The Housing Topic Paper and the Strategic Land Availability Assessments. The evidence supported a lower housing delivery of 6,196 houses with a strategy of regeneration and	

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								must form part of the Local Plan. The majority of Canvey's residents are of the same opinion. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families. As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.													urban densification.	
1109-0003	Robert	Martin				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N			

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1110-0001	Andrew	Elliot				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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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																		of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	

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1110-0002	Andrew	Elliot				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families. As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.													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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1110-0003	Andrew	Elliot				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	N

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																	those residents living at East Canvey	within the Castle Point Plan	
1111-0001	Philip	Moran				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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																		withdrawn and that site remains within the extent of the Green Belt. That site was not promoted for consideration for inclusion within the Castle Point Plan, and is not therefore available for development purposes. Separately, it has been identified through the Open Space Assessment and the Green and Blue Infrastructure Strategy as a potential site for the delivery of Biodiversity Net Gain which the landowner intends to bring forward.	

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1111-0002	Philip	Moran				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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1114-0003	Pauline	Jones				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	N

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1115-0001	Derek	Warren				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1115-0002	Derek	Warren				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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1116-0001	Sharon	Moran				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1118-0001	Robert	Jones				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1118-0002	Robert	Jones				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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1119-0001	William	Shotton				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1120-0001	Barbara	Harmer				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1121-0003	Margaret	Brennan				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	N

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																	those residents living at East Canvey	within the Castle Point Plan	
1122-0001	Rosemary	Grimsley				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1122-0002	Rosemary	Grimsey				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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1122-0003	Rosemary	Grimsey				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	N

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																	those residents living at East Canvey	within the Castle Point Plan	
1123-0001	Ian	Grimsley				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1123-0002	Ian	Grimsey				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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1124-0001	Joyce	Sanders				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1125-0001	Graham	Sanders				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1125-0003	Graham	Sanders				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	N

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1126-0001	Brenda	Tanner				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1127-0001	John	Tanner				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1128-0001	Christine	Tuggey				Hou5	No	Failed to consider strategic alternatives like North West Thundersley. No credible five-year housing land supply.	No	Justified, Consistent with National Policy	The plan has included Thorney Bay development for 173 homes, so what makes the H031 site any different... Policy Hou5 states, new park homes will only be supported on existing Park Home sites...	Add North West Thundersley site, 187 Ha, as a Greenbelt, Grey Belt, Brownfield site option for 7500 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.					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	N

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1128-0002	Christine	Tuggey				SP3		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 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. 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 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.	No	Not justified; not consistent with NPPF; biased against Greenbelt/Grey Belt.	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.					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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								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. In light of these issues, at our last committee meeting we voted to support the residents with their objections, and have collected 131 signatures in support of an alternative proposal and have completed a joint response form in order to represent our residents and their families. As Chair and representative of the Residents Association I would also like to participate at the oral examination and be invited to speak on their behalf. I enclose the signature sheets completed by the residents, together with the completed Joint Response form and should be grateful if you would kindly acknowledge receipt using the email address shown above.													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.	
1128-0003	Christine	Tuggey				C4					Canvey West homes put residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for	The safety of all Castle Point residents is a priority and has been considered	N

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																	those residents living at East Canvey	within the Castle Point Plan	
1129-0001	Individual	Simone	Caldecourt			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	appropriate for Canvey Island's unique geography and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	Capacity Topic Paper August 2025. <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> Green Belt/Grey	

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																		belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1129-0002	Individual	Simone	Caldecourt			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								improves the overall site environment for the local residents.											
1129-0003	Individual	Simone	Caldecourt			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1130-0001	Individual	Pat	Moore			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no Greenbelt / Grey Belt sites added, and the exclusion of the North West Thundersley 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 that this is considerably less housing than the Standard Method housing need but considers based on the evidence	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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											homes for Canvey is not resident led						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	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>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	

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1130-0002	Individual	Pat	Moore			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to	N

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								only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.										the sites environment	
1130-0003	Individual	Pat	Moore			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1131-0001	Individual	Iris	Staley			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		through the SFRA.	
1131-0002	Individual	Iris	Staley			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1131-0003	Individual	Iris	Staley			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1132-0001	Individual	Carol	Simmons			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1132-0002	Individual	Carol	Simmons			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1132-0003	Individual	Carol	Simmons			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1133-0001	Individual	Ken	Childs			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1133-0002	Individual	Ken	Childs			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1133-0003	Individual	Ken	Childs			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1134-0001	Individual	Jan	Childs			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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113 4-000 2	Individual	Jan	Childs			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
113 4-000 3	Individual	Jan	Childs			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
113 5-000 1	Individual	Jan	Sinclair			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1135-0002	Individual	Jan	Sinclair			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1135-0003	Individual	Jan	Sinclair			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1136-0001	Individual	Angela	Riggs			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1136-0002	Individual	Angela	Riggs			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1136-0003	Individual	Angela	Riggs			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1137-0001	Individual	Edward	Howard			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1137-0002	Individual	Edward	Howard			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1137-0003	Individual	Edward	Howard			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1138-0001	Individual	Marion	Davies			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1138-0002	Individual	Marion	Davies			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1138-0003	Individual	Marion	Davies			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1139-0001	Individual	Kenneth	Green			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1139-0002	Individual	Kenneth	Green			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1139-0003	Individual	Kenneth	Green			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1140-0001	Individual	Richard	Ivory			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1140-0002	Individual	Richard	Ivory			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1140-0003	Individual	Richard	Ivory			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1141-0001	Individual	Angela	Ivory			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1142-0001	Individual	Alan	Dyer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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1142-0002	Individual	Alan	Dyer			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1142-0003	Individual	Alan	Dyer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1143-0001	Individual	Angela	Reading			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1143-0002	Individual	Angela	Reading			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1143-0003	Individual	Angela	Reading			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1144-0001	Individual	Sheila	Durrance			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1144-0002	Individual	Sheila	Durrance			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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114-4-0003	Individual	Sheila	Durrance			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
114-5-0001	Individual	Robert	Spicer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1145-0002	Individual	Robert	Spicer			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1145-0003	Individual	Robert	Spicer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1146-0001	Individual	Sheila	Spicer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1146-0002	Individual	Sheila	Spicer			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
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1147-0001	Individual	Patricia	Belcher			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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1147-0002	Individual	Patricia	Belcher			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1147-0003	Individual	Patricia	Belcher			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	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
1148-0001	Individual	Brenda	Gorham			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1148-0002	Individual	Brenda	Gorham			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
1148-0003	Individual	Brenda	Gorham			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1149-0001	Individual	Barbara	Montgomery			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1149-0002	Individual	Barbara	Montgomery			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1149-0003	Individual	Barbara	Montgomery			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1150-0001	Individual	Ron	Rowe			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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1150-0002	Individual	Ron	Rowe			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1150-0003	Individual	Ron	Rowe			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1151-0001	Individual	Jan	Rowe			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1151-0002	Individual	Jan	Rowe			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1151-0003	Individual	Jan	Rowe			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1152-0001	Individual	Janette	Green			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																		Green Belt Assessments. <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.	
1152-0002	Individual	Janette	Green			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1152-0003	Individual	Janette	Green			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1153-0001	Individual	Joan	McGilligan			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1157-0003	Individual	Elizabeth	Heard			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1158-0001	Individual	Corinne	Young			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1158-0002	Individual	Corinne	Young			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1158-0003	Individual	Corinne	Young			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1159-0001	Individual	Mary	Robinson			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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1159-0002	Individual	Mary	Robinson			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1159-0003	Individual	Mary	Robinson			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1160-0001	Individual	Jean	Starbuck			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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1160-0003	Individual	Jean	Starbuck			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1161-0001	Individual	Jean	Rae side			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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116 1-000 3	Individual	Jean	Rae side			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
116 2-000 1	Individual	Maureen	De mering			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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1162-0002	Individual	Maureen	Demering			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1162-0003	Individual	Maureen	Demering			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1163-0001	Individual	David	Eve			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1163-0002	Individual	David	Eve			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1163-0003	Individual	David	Eve			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1164-0001	Individual	Samantha	Ball			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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1164-0002	Individual	Samantha	Ball			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1164-0003	Individual	Samantha	Ball			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1165-0001	Individual	Jacqueline	Mosedale			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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1165-0002	Individual	Jacqueline	Mosdale			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1165-0003	Individual	Jacqueline	Mosdale			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1166-0001	Individual	Irene	Mitchell			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1166-0002	Individual	Irene	Mitchell			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
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1167-0001	Individual	Peter	Davis			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1167-0002	Individual	Peter	Davis			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1167-0003	Individual	Peter	Davis			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1168-0001	Individual	Eileen	Davis			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1168-0002	Individual	Eileen	Davis			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1168-0003	Individual	Eileen	Davis			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1169-0001	Individual	Helena	Wright			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1169-0002	Individual	Helen	Wright			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1169-0003	Individual	Hel en	Wright			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1170-0001	Individual	Derek	Champion			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1170-0002	Individual	Derek	Champion			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1170-0003	Individual	Derek	Champion			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1171-0001	Individual	Harry	Page			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1171-0002	Individual	Harry	Page			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1171-0003	Individual	Harry	Page			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1172-0001	Individual	Sylvia	Page			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1172-0002	Individual	Sylvia	Page			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1172-0003	Individual	Sylvia	Page			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1173-0001	Individual	Lilian	Eniffer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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											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						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	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>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	

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1175-0001	Individual	Andy	Carroll			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1175-0002	Individual	Andy	Carr oll			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
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1177-0002	Individual	Carole	Aubin			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1177-0003	Individual	Carole	Aubion			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1178-0001	Individual	Kenneth	Hall			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1178-0002	Individual	Kenneth	Hall			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1178-0003	Individual	Kenneth	Hall			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1179-0001	Individual	Patricia	Cantwell			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1179-0002	Individual	Patricia	Canwell			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1179-0003	Individual	Patricia	Canwell			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1180-0001	Individual	Bernard	Lewin			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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118 2-000 1	Individual	Clive	Schooling			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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118 2-000 2	Individual	Clive	Schooling			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
118 2-000 3	Individual	Clive	Schooling			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
118 3-000 1	Individual	Victor	Whelan			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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
																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1183-0002	Individual	Victor	Whe lan			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1183-0003	Individual	Victor	Whe lan			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	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
1184-0001	Individual	Jeanette	Size r			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1184-0002	Individual	Jeanette	Size			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
1184-0003	Individual	Jeanette	Sizer			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1185-0001	Individual	Julie	Titheradge			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1185-0002	Individual	Julie	Titheradge			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1185-0003	Individual	Julie	Titheradge			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1186-0001	Individual	Mr B	Hodgson			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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118 6-000 2	Individual	Mr B	Hodgson			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
118 6-000 3	Individual	Mr B	Hodgson			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
118 7-000 1	Individual	Mrs B	Hodgson			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1187-0002	Individual	Mrs B	Hodgson			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1187-0003	Individual	Mrs B	Hodgson			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1188-0001	Individual	Pauline	Oddy			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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1188-0002	Individual	Pauline	Oddy			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1188-0003	Individual	Pauline	Oddy			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1189-0001	Individual	Janet	Burton			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1189-0002	Individual	Janet	Burton			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1189-0003	Individual	Janet	Burton			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1190-0001	Individual	Carol	Charles			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1190-0002	Individual	Carol	Charles			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
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1191-0001	Individual	Melvyn	Jarvis			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1191-0002	Individual	Melvyn	Jarvis			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1191-0003	Individual	Melvyn	Jarvis			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	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
1192-0001	Individual	Sandra	Jarvis			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1192-0002	Individual	Sandra	Jarvis			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
119 2-000 3	Individual	Sandra	Jarvis			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
119 3-000 1	Individual	David	Can ty			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1193-0002	Individual	David	Canby			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1193-0003	Individual	David	Can ty			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1194-0001	Individual	Stephen	Edgworth			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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119 4-000 2	Individual	Stephen	Edgeworth			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
119 4-000 3	Individual	Stephen	Edgeworth			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
119 5-000 1	Individual	Barbara	Waters			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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1195-0002	Individual	Barbara	Waters			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1195-0003	Individual	Barbara	Waters			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1196-0001	Individual	Norman	Neil			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1196-0002	Individual	Norman	Neil			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1196-0003	Individual	Norman	Neil			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1197-0001	Individual	Jill	Watts			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1201-0003	Individual	David	Jones			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1202-0001	Individual	John	Mogford			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1202-0002	Individual	John	Mogford			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1202-0003	Individual	John	Mogford			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1203-0001	Individual	Barbara	Radley			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1203-0002	Individual	Barbara	Radley			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1203-0003	Individual	Barbara	Radley			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1204-0001	Individual	Daphne	McQuade			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1204-0003	Individual	Daphne	McQuade			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1205-0001	Individual	David	White			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1206-0001	Individual	Brian	Norman			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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1206-0002	Individual	Brian	Norman			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1206-0003	Individual	Brian	Norman			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1207-0001	Individual	Mary	Drummond			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1207-0002	Individual	Mary	Drummond			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1207-0003	Individual	Mary	Drummond			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1208-0001	Individual	Chris	Silvester			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1208-0002	Individual	Chris	Silvester			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1208-0003	Individual	Chris	Silvester			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1209-0001	Individual	Christine	Lockwood			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1209-0002	Individual	Christine	Lockwood			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1209-0003	Individual	Christine	Lockwood			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1210-0001	Individual	Mark	Lockwood			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1210-0002	Individual	Mark	Loc kwood			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1210-0003	Individual	Mark	Loc kwood			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1211-0001	Individual	Heather	Shackleton			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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
																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1211-0002	Individual	Heather	Shackleton			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1211-0003	Individual	Heather	Shackleton			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1212-0001	Individual	Karen	Lan gworth			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1212-0002	Individual	Karen	Lan gwo rth			Hou 5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
1212-0003	Individual	Karen	Lan gworth			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1213-0001	Individual	Anne	Roud			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1213-0002	Individual	Anne	Roud			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1213-0003	Individual	Anne	Roud			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1214-0001	Individual	Margaret	White			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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1214-0002	Individual	Margaret	White			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1214-0003	Individual	Margaret	White			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1215-0001	Individual	Kenneth	Carter			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1215-0002	Individual	Kenneth	Carter			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1215-0003	Individual	Kenneth	Carter			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1216-0001	Individual	Dorothy	Carter			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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1216-0002	Individual	Dorothy	Carter			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1216-0003	Individual	Dorothy	Carter			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1217-0001	Individual	Eunice	Sawyer			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1220-0003	Individual	Janet	Norman			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1221-0001	Individual	Kenneth	Sheilds			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1221-0002	Individual	Kenneth	Sheilds			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1221-0003	Individual	Kenneth	Sheilds			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1222-0001	Individual	Susan	Webb			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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122 2-000 2	Individual	Susan	Webb			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
122 2-000 3	Individual	Susan	Webb			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
122 3-000 1	Individual	Maggie	Webb			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1223-0002	Individual	Maggie	Webb			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1223-0003	Individual	Maggie	Webb			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1224-0001	Individual	Dale	Gowler			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
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1225-0001	Individual	Ken	Hearld			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1225-0002	Individual	Ken	Heard			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1225-0003	Individual	Ken	Hear d			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1226-0001	Individual	Carol	Hear d			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1226-0002	Individual	Carol	Heard			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1226-0003	Individual	Carol	Heard			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1227-0001	Individual	Terry	Caws			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1227-0002	Individual	Terry	Caws			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1227-0003	Individual	Terry	Caws			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1228-0001	Individual	Raymond	Baker			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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1228-0003	Individual	Raymond	Baker			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1229-0001	Individual	Mr A	Oliver			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1230-0002	Individual	Mrs P	Oliver			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1230-0003	Individual	Mrs P	Oliver			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1231-0001	Individual	Jacqueline	Houso me			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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 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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1231-0002	Individual	Jacqueline	Housoome			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1231-0003	Individual	Jacqueline	Housoome			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	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
1232-0001	Individual	Susan	Reed			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1232-0002	Individual	Susan	Reed			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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123 2-000 3	Individual	Susan	Reed			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
123 3-000 1	Individual	Daniel	Davies			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1233-0002	Individual	Daniel	Davies			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1233-0003	Individual	Daniel	Davies			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1234-0001	Individual	Jam es	Montgomery			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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123 4-000 2	Individual	James	Montgomery			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
123 4-000 3	Individual	James	Montgomery			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
123 5-000 1	Individual	Christine	Payne			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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																		to the ECC SuDS design Guide for Essex. Canvey SuDS options have been considered through the SFRA.	
1235-0002	Individual	Christine	Payne			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1235-0003	Individual	Christine	Payne			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	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
1236-0001	Individual	Barbara	Hedges			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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																		Green Belt Assessments. <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.	
1236-0002	Individual	Barbara	Hedges			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	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
1236-0003	Individual	Barbara	Hedges			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1237-0001	Individual	John	Potts			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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																		Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	
1237-0002	Individual	John	Potts			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1237-0003	Individual	John	Potts			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1238-0001	Individual	Sue	Cameron			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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																		transport evidence. In addition, Sustainability Appraisal (Policy SP3 option 4) outlines why North West Thundersley was not preferred. <u>Green Belt/Grey Belt</u> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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.	

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1238-0002	Individual	Sue	Cameron			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1238-0003	Individual	Sue	Cameron			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1239-0001	Individual	Steve	Clifford			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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1239-0002	Individual	Steve	Clifford			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1239-0003	Individual	Steve	Clifford			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1240-0001	Individual	Angela	Harris			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1240-0002	Individual	Angela	Harris			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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1240-0003	Individual	Angela	Harris			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1241-0001	Individual	Terry	Hill			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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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 , the proposed 3316 urban homes for Canvey is not resident led	Castle Point’s approach to the site review is outlined within the Housing Capacity Topic Paper August 2025. <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	

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1241-0002	Individual	Terry	Hill			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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124 1-000 3	Individual	Terry	Hill			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
124 2-000 1	Individual	Robert	Hawkins			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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124 2-000 2	Individual	Robert	Hawkins			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
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124 3-000 1	Individual	Mr K	Chandler			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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1243-0002	Individual	Mr K	Chandler			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1243-0003	Individual	Mr K	Chandler			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1244-0001	Individual	Den	Chandler			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	

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1244-0002	Individual	Den	Chandler			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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124-4-0003	Individual	Den	Chandler			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
124-5-0001	Individual	Thomas	Newton			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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1245-0002	Individual	Thomas	Newton			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust,									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N

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								make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.											
1245-0003	Individual	Thomas	Newton			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1246-0001	Individual	Michael	Rogers			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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,	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. Total housing target of 11,000.					Plan is 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 Brownfield sites", has not considered all sites, with no	<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 Development (including SuDS)

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											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						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	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>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	

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1247-0001	Individual	Colin	Bywater			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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1250-0002	Individual	Colin	ODonovan			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1250-0003	Individual	Colin	ODonovan			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N
1251-0001	Individual	Philomena	Odonovan			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We consider the Castle Point Plan Regulation 19 Draft to	No	Justified, Consistent with National Policy	We 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 Brownfield	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. Total housing target of 11,000.					Plan is 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	<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	Y - See Schedule of Mods, in relation to Canvey, Infrastructure and Sustainable Development (including SuDS)

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								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.			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						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	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>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	

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																		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> Green Belt/Grey belt covered under policy GB2 and supporting Green Belt Assessments. <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	

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1251-0002	Individual	Philomena	Odonovan			Hou5		The plan has included Thorney Bay development for 173 homes, so what makes the HO31 site any different. The Hou5 Policy states, new park homes will only be supported on existing Park Home sites. All of our homes are robust, make provision for cold weather and risk from flooding, but the Hou5 policy should allow further development which improves the overall site environment for the local residents.									Policy HOU5 should make provision for improved site environment for the local residents	Comments noted. Policy HOU5 does not restrict improvement to the sites environment	N
1251-0003	Individual	Philomena	Odonovan			C4					The number of Canvey West homes puts residents in the East at risk with emergency evacuation procedures.						Development at West Canvey will impact emergency evacuation procedures for those residents living at East Canvey	The safety of all Castle Point residents is a priority and has been considered within the Castle Point Plan	N

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1252-0001	Individual	Anastasia	Power			SP3	No	This is the response from Kings Park Residents Association on behalf of the 149 residents who have signed the accompanying forms, and the 75 residents who have signed the enclosed letters, in response to the Castle Point Plan Regulation 19 Draft consultation, as reopened 24th October 2025 and closing 5th December 2025. Policy reference/name: Hou5 Page number: 92 Paragraph number: 13.43-13.46 We 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	We 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 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 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. Total housing target of 11,000.					Plan is 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 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	<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 Development (including SuDS)

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																	and drainage infrastructure , the proposed 3316 urban homes for Canvey is not resident led	<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> Green Belt/Grey belt covered under policy GB2 and supporting	